California Environmental Laboratory Accreditation Program (ELAP)

Environmental Laboratory Technical Advisory Committee (ELTAC) Meeting

July 18, 2018

State Water Resources Control Board
Division of Drinking Water

NOTICE OF ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE (ELTAC) MEETING

July 18, 2018
10:00 a.m. – 4:30 p.m.
(or until completion of business)

Location 1	**Location 2**
California Environmental Protection Agency Building	Metropolitan Water District of Southern California
1001 I Street, Conference Room 2540	700 North Alameda Street, Room 2-145
Sacramento, CA 95814	Los Angeles, CA 90012

The Environmental Laboratory Accreditation Program (ELAP) will host a meeting of its technical advisory committee, as noted above. The notice and agenda for this meeting and others can be found at www.waterboards.ca.gov/elap. For further information regarding this agenda, see below or contact ELAP at elapca@waterboards.ca.gov or (916) 323-3431.

This meeting is available via webcast at https://video.calepa.ca.gov/.

AGENDA

ITEM 1 – Call to Order/Roll Call
ITEM 2 – Public Comments on Items Not on Agenda
ITEM 3 – Approval of March 28, 2018 Meeting Minutes
ITEM 4 – DELAPO Report (to include a review of progress on the ELAP Expert Review Panel recommendations, speaking engagement information, updates from State Regulatory Agency partners, an update on ELAP Assessor Training Contract, information on proficiency testing compliance, and an enforcement update)
ITEM 5 – Informational Item: Central Valley Regional Water Quality Control Board – Pyrethroid Basin Plan Amendment
ITEM 6 – ELTAC Workgroup Update – Method Detection Limits
ITEM 7 – ELTAC By-Laws
ITEM 8 – ELAP Second Preliminary Draft Regulations

***ITEM 9** – Informational Item: Independent 2017 Survey of ELAP Laboratories (*this item may be moved to a future meeting agenda if the ELTAC Chairperson determines the committee needs more time to address any items ahead of it on the agenda)

ITEM 10 – Close – Review Action Items

Action may be taken on any item on the agenda. The time and order of agenda items are subject to change at the discretion of the ELTAC Chair and may be taken out of order. The meeting will be adjourned upon completion of the agenda, which may be at a time earlier or later than posted in this notice.

In accordance with the Bagley-Keene Open Meeting Act, all meetings of ELTAC are open to the public.

Government Code section 11125.7 provides the opportunity for the public to address each agenda item during discussion or consideration by ELTAC prior to ELTAC taking any action on said item. Members of the public will be provided appropriate opportunities to comment on any issue before ELTAC, but the ELTAC Chair may, at his or her discretion, apportion available time among those who wish to speak. Individuals may appear before ELTAC to discuss items not on the agenda; however, ELTAC can neither discuss nor take official action on these items at the time of the same meeting [Government Code sections 11125 and 11125.7(a)].

The meeting locations are accessible to the physically disabled. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting Katelyn McCarthy at (916) 322-7902 or emailing katelyn.mccarthy@waterboards.ca.gov. Providing your request at least five business days before the meeting will help to ensure availability of the requested accommodation.

Webcast Information

Webcast	**https://video.calepa.ca.gov/**

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
ELTAC MEETING

Wednesday, July 18, 2018 – 10:00 a.m.
1001 I Street, Conference Room 2540
Sacramento, CA 95814
And
Metropolitan Water District of Southern California
700 North Alameda Street, Room 2-145
Los Angeles, CA 90012

Meeting Agenda

TIME	AGENDA ITEM	PRESENTER(S)
10:00am	**Call to Order** *Objective: Roll call.*	Stephen Clark, *Chairperson*
10:00am	**Public Comments on Items Not on Agenda**	Open
10:05am	**Approval of March 28, 2018 Meeting Minutes** *Objective: Amend or approve minutes.*	Stephen Clark, *Chairperson*
10:10am	**DELAPO Report** *Objective: Update members on recent developments and activities.*	Christine Sotelo, *DELAPO*
11:00am	**Informational Item: Central Valley Regional Water Quality Control Board – Pyrethroid Basin Plan Amendment** *Objective: Provide information to committee members.*	Jessica Mullane, *Central Valley Regional Water Quality Control Board*

11:30am	**ELTAC Workgroup Update - Method Detection Limits** *Objective: Update members on workgroup progress.*	David Kimbrough, *Member*
12pm-1:15pm	Lunch	
1:15pm	**ELTAC By-Laws** *Objective: Review proposed revisions to ELTAC By-Laws.*	Stephen Clark, *Chairperson*
1:45pm	**ELAP Second Preliminary Draft Regulations** *Objective: Provide information to committee members and solicit feedback on specific items.*	Jacob Oaxaca, *ELAP*
4:00pm	**Informational Item: Independent 2017 Survey of ELAP Laboratories*** *Objective: Provide information to committee members.*	Amber Baylor, *South Orange County Water Authority*
4:30pm	**Close – Review Action Items** *Objective: Review any assignments generated during the meeting and adjourn.*	Stephen Clark, *Chairperson*

*Note that this item may be moved to a future meeting if the ELTAC Chairperson determines the committee needs more time to address any items ahead of it on the agenda.

ELTAC Meeting

July 18, 2018

Sacramento and Los Angeles

ROLL CALL

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
ELTAC MEETING
Wednesday, July 18, 2018 – 10:00 a.m.
1001 I Street, Conference Room 2540
Sacramento, CA 95814
And
700 North Alameda Street, Room 2-145
Los Angeles, CA 90012

MEETING PACKET

Roll Call

Name	Affiliation	Member Type	Present
Diane Anderson	APPL, Inc.	Rep	
Mindy Boele	CWEA	Rep	
Jill Brodt	Brelje and Race Laboratories	Rep	
Gail Cho	CA Dept. of Fish and Wildlife	SRAE	
Stephen Clark	Pacific EcoRisk	Rep	
Ronald Coss	CWEA	Rep	
Huy Do	CASA	Rep	
Andy Eaton	Eurofins Eaton Analytical	Rep	
Miriam Ghabour	Metropolitan Water District of Southern California	Rep	
Bruce Godfrey	ACIL	Rep	
Anthony Gonzales	CAPHLD	Rep	
Rich Gossett	Physis Environmental	Rep	
David Kimbrough	Pasadena Water and Power	Rep	
Mark Koekemoer	Central Marin Sanitation Agency	Rep	
Bruce LaBelle	Dept. of Toxic Substances Control	SRAE	
Allison Mackenzie	Babcock Laboratories	Rep	
Sean McCarthy	Division of Drinking Water	SRAE	
Christine Sotelo	CA ELAP	DELAPO	
Renee Spears	State Water Resources Control Board	SRAE	

Abbreviation	Member Type
DELAPO	Designated ELAP Officer, nonvoting
Scribe	Minutes (non-member)
SRAE	State Regulatory Agency Employee, nonvoting
Rep	Representative Member, voting

PUBLIC COMMENTS ON ITEMS NOT ON AGENDA

Public Comments on Items Not on Agenda

Members of the public may address the Environmental Laboratory Technical Advisory Committee (ELTAC) regarding items that are not contained in the meeting agenda at this time.

However, ELTAC may not discuss or take action on any item raised during this public comment session, except to decide whether to place the matter on the agenda of a future meeting [Government Code sections 11125 and 11125.7(a)].

APPROVAL OF MARCH 28, 2018 MEETING MINUTES

Stephen Clark, Chairperson

CALIFORNIA ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE (ELTAC)
COMMITTEE MEETING MINUTES
MARCH 28, 2018

More information on the Environmental Laboratory Accreditation Program (ELAP) and previous ELTAC meetings can be found at http://www.waterboards.ca.gov/elap.

CALL TO ORDER

Chairperson Stephen Clark called the meeting to order on March 28, 2018 at 10:07 a.m. at the California Environmental Protection Agency Headquarters, 1001 I Street, Conference Room 2540, Sacramento, CA 95814 and the Metropolitan Water District of Southern California, 700 North Alameda Street, Room 1-102, CA 90012.

COMMITTEE MEMBERS PRESENT

DELAPO: Christine Sotelo
Representatives (voting):
Diane Anderson
Mindy Boele
Jill Brodt
Stephen Clark
Ronald Coss
Huy Do
Andy Eaton
Miriam Ghabour
Bruce Godfrey
Anthony Gonzalez
David Kimbrough
Mark Koekemoer
State Regulatory Agency Employees (non-voting):
Bruce Burton
Gail Cho
Bruce LaBelle
Renee Spears
Not Present:
Rich Gossett
Allison Mackenzie

OTHER STAFF PRESENT

Scribe: Katelyn McCarthy
ELAP: Maria Friedman, Jacob Oaxaca

ANNOUNCEMENT

- *Evacuation information in case the fire alarm goes off during the meeting.*
- *The Committee meeting is being webcast and recorded.*

COMMITTEE MEETING

PUBLIC FORUM
Any member of the public may address and ask question of the Committee relating to any matter within ELTAC's scope provided the matter is not on the agenda, or pending before the Advisory Committee.

COMMITTEE BUSINESS

Call to Order/Roll Call

Public Comments on Items Not on Agenda
(The Committee will not take any action but will consider placing any item raised on the agenda at a future meeting.)

Approval of Minutes from December 6, 2017 Meeting

Motion: Member Eaton moved to adopt the minutes.
Seconded by: Member Gonzalez
MOTION CARRIED: March 28, 2018

Aye:	Member Anderson
	Member Boele
	Member Brodt
	Member Clark
	Member Coss
	Member Do
	Member Ghabour
	Member Godfrey
	Member Kimbrough
	Member Koekemoer
Nay:	None
Absent:	Member Gossett
	Member Mackenzie
Abstain:	None

ELTAC Member Presentation
Member Kimbrough, Pasadena Water and Power

Member Kimbrough presented thoughts on interim accreditation, the Drinking Water Laboratory Certification Manual, on-site assessment schedules, and certificate expiration dates for the committee's consideration.

DELAPO Report

- ***DELAPO Christine Sotelo welcomed new chairperson, Stephen Clark.***
- ***Staffing updates***
  - ***New staff in PT Unit – Janet Hernandez***
  - ***New Supervisor of Program Development, Research, and Enforcement Unit – Jacob Oaxaca***

- ***Sotelo informed the committee about the results of US EPA's 2017 audit of CA ELAP.***
  - ***EPA is pleased with ELAP's progress***
  - ***Findings were administrative in nature (documentation and certificate dates)***
- ***Sotelo provided information on the Drinking Water Certification Manual***
  - ***ELAP is necessary for DDW to maintain primacy under the Safe Drinking Water Act.***
  - ***Cert manual sets out federal requirements, and makes recommendations to laboratories about what EPA considers to be best practice***
- ***Sotelo provided information about the program's use of "interim" certificates to allow ELAP more time to assess a laboratory.***
  - ***Laboratories with interim certificates can do business as usual.***
- ***Sotelo provided an update on the Regulations Development timeline.***
  - ***Anticipate regulations becoming effective in the second quarter of 2019***
- ***Sotelo described her recent trip to the Forum on Environmental Accreditation***
  - ***The TNI community discussed the changes to the Standard that California is proposing in the draft regulations.***
- ***Sotelo provided an update on ELAP's Assessor Training Contract***
  - ***Positive feedback on NV5 assessors from pilot round laboratories***
  - ***Assessments are longer than past ELAP assessments because of training, broad gap analysis, and answering questions for laboratory staff.***
  - ***Reports have been delayed during initial training period. ELAP is committed to getting reports to laboratories within 30 days in the future.***
  - ***Reports have new electronic format and delivery***
  - ***The gap analysis is broad – not detailed down to every line item in the TNI Standard.***
  - ***ELAP is now accepting Corrective Action Plans and not requiring laboratories to submit supporting documentation. Corrective Actions will be verified during the next on-site assessment and documentation can be requested at any time.***
- ***Sotelo informed the committee that the Early TNI Implementation Project would include two laboratories (instead of the originally proposed six) due to funding availability. The timeline for the execution of this contract was extended to 2020 due to the Water Board's Contract Unit backlog.***
- ***Sotelo informed the committee that ELAP is working on a Memorandum of Understanding to formalize its acceptance of third-party assessments for accreditation. ELTAC will be asked to review the draft document at a future meeting.***
- ***Sotelo informed the committee that the proposed Intercalibration Contract was being postponed because funding was not available this year.***
- ***Sotelo discussed the increase in the number of requests for assistance and training ELAP staff have been receiving from California State regulatory programs and its impact on ELAP's workload. ELAP is working with the Water Board Training Office to develop a training series to meet these needs.***
- ***Sotelo charged the committee with identifying how ELAP could support mentor groups or workgroups that had formed to assist each other with implementation of the TNI Standard. The committee suggested that any groups that need assistance should reach out directly to ELAP.***

US EPA Methods Update Rule

Jacob Oaxaca informed the committee that ELAP anticipated releasing new Field of Testing lists that included the methods and revisions from the 2017 US EPA Methods Update rule in June 2018. He asked the committee to advise ELAP on whether California should require the new Method Detection Limit (MDL)

procedure requirements should be applied to all matrices or only to wastewater. An informal workgroup was formed to address the request. Members Cho, Do, Ghabour, and Kimbrough volunteered to be on the workgroup.

ELTAC By-Laws

The ELTAC By-Laws are currently scheduled to be reviewed by ELAP and ELTAC. Chairperson Clark suggested ELAP distribute a Microsoft Word version of the document to all members following the meeting, and ELTAC members submit proposed revisions to ELAP via Katelyn McCarthy by April 30th. Committee members and ELAP agreed to this plan.

Orange County Sanitation District's Transition to the TNI Standard
Member Coss, Orange County Sanitation District

Member Coss gave committee members an overview of his laboratory's transition to the TNI standard to inform a discussion about the costs and time it would take for laboratories in California to implement the new requirements if the regulations are adopted.

Informational Item: Division of Drinking Water Priorities
Melissa Hall, Division of Drinking Water

Melissa Hall presented information to the committee about the Division of Drinking Water's regulatory priorities. She requested committee assistance in two areas – examination of several Detection Limits for Reporting (DLR's) and the formulation of a laboratory survey about changes to data reporting requirements. Two informal workgroups were formed:

- DLR – Members Eaton, Ghabour, Kimbrough
- Data Reporting – Members Boele, Eaton, Ghabour

Action Items

- ***Katelyn McCarthy – send Doodle poll for July meeting dates***
- ***Katelyn McCarthy – send Word version of ELTAC By-Laws with due date to committee members***
- ***Committee members – send proposed revisions to ELTAC minutes to Katelyn by April 30th***
- ***Katelyn McCarthy – send draft meeting minutes to members within 30 days***

Adjournment

The Committee adjourned at 3:29pm.

DELAPO REPORT

Christine Sotelo, ELAP

Accomplishments since your last meeting

- The framework you established for new Agency Partner regulatory needs is working
  - We have received many requests for assistance
  - We see this as major progress
- Welcome to a new State Regulatory Agency Representative
  - Sean McCarthy will represent the Division of Drinking Water
  - Bruce Burton has retired

Looking Back – Expert Panel Recommendations

- ***Establish internal management system***
- Adopt laboratory accreditation standard
- Ensure relevant analytical methods
- Enhance Communication
- Expand Resources

Establish Internal Management System

- Adopted TNI Volume 2 – General Requirements for Accreditation Bodies Accrediting Environmental Laboratories
- Quality Assurance Officer assures we follow the standard
- Internal audit and management review is scheduled for this year
- We are proud of this accomplishment
  - And we are committed to continuous improvement

Looking Back – Expert Panel Recommendations

- Establish internal management system
- ***Adopt laboratory accreditation standard***
- Ensure relevant analytical methods
- Enhance Communication
- Expand Resources

Adopt Laboratory Accreditation Standard

- Selected TNI Volume 1 with two modifications after stakeholder outreach period
  - ELTAC played a critical role
  - Board members support this approach
- Anticipate adoption in 2019 as part of the draft regulations package
- This has taken longer than anticipated
  - We are okay with this
  - We want to get it right

Looking Back – Expert Panel Recommendations

- Establish internal management system
- Adopt laboratory accreditation standard
- ***Ensure relevant analytical methods***
- Enhance Communication
- Expand Resources

Ensure Relevant Analytical Methods

- This is a continuous task
- Requires consistent communication with State Agency Partners
- We are being responsive to clients
- Method Update Rule
  - Anticipate August release – slightly delayed

Looking Back – Expert Panel Recommendations

- Establish internal management system
- Adopt laboratory accreditation standard
- Ensure relevant analytical methods
- ***Enhance Communication***
- Expand Resources

Communications

- This is an on-going task
  - Drastic change from the old ELAP
  - And there is always room to improve further
- We are communicating with the laboratory community
  - ELTAC
  - Speaking engagements
- We have established relationships with our State Agency Partners
  - Committee meetings
  - Individual agency meetings
  - Receiving many requests for assistance

CWEA Conference

- This was our third year speaking at the conference
  - We appreciate being invited to participate
- Jacob Oaxaca gave a regulatory update to a full session
- We heard valuable feedback and enjoyed interacting with the laboratory community
  - We were also encouraged to see many sessions related to laboratory issues

National Environmental Monitoring Conference

- We will speak at the National Environmental Monitoring Conference in New Orleans, LA
  - California ELAP Update is on Monday, August 6th
- We are making sure the national laboratory community feels California's presence
  - Support us by attending or joining TNI to be a part of the conversations on issues that effect the entire community

Mentor Group follow up

- Last meeting we offered support to any laboratory mentor groups that have formed to assist each other with the implementation of the TNI standard
  - We have not received any requests
- Our offer still stands
- Reach out to us if you need support

Agency Partner Relationships

- Communication with our regulatory partners has greatly improved
  - And we have an increased amount of work as a result
- We are received many requests for items on ELTAC agendas
  - And are working in conjunction with the Chairperson to determine which items can be provided as updates and which should be agenda items
- We have updates from two of our regulatory partners on changes that will effect the laboratory community that I will cover
  - And one agenda item later this morning

Division of Drinking Water – WQM Reporting Requirements

The Division of Drinking Water (DDW) plans to send an email to all drinking water laboratories tentatively in August clarifying reporting requirements to the Water Quality Monitoring (WQM) Upload Portal (http://drinc.ca.gov/WQM/) as follows:

- Water quality results that are submitted to the WQM and to the water systems must be the same. That is, the water quality results must have the same number of significant figures.
- 'ND' (Non-Detect) will no longer be an acceptable entry in the Result Field of the res file. Currently, when a laboratory enters 'ND' into the result field, the 'ND' is converted into a string of zeroes once the res file makes its way in the WQM database. This has been deemed to not be appropriate and therefore will not be permitted.
- '0' will no longer be an acceptable entry in the Result Field of the res file. A finding of '0' has been deemed to not be an appropriate result to be uploaded in the WQM database and will therefore not be permitted.

Division of Drinking Water – WQM Reporting Requirements

- In order to submit a result that is less than the Detection Limit for purposes of Reporting (DLR), a '<' sign in the XMOD Field along with the chemical's DLR must be used. A '<' sign along with a numerical value less than the DLR will be accepted. Likewise, a result that has been detected lower than the DLR may be reported and will be accepted.
  - An example would be the case for a laboratory that can detect perchlorate down to 2 ppb, which is lower than the DLR of 4 ppb. If an analysis results in ND, the laboratory may report the finding as '<2'. If the same laboratory has an analysis of 2.5 ppb, the laboratory may report the finding as '2.5'.)
- For an analysis that results in a ND for a chemical with no DLR assigned, a '<' sign in the XMOD Field along with the Laboratory Reporting Level must be used.

These changes are expected to take effect in September and will be detailed in the email sent to WQM users. For additional information contact Paul Williams at paul.williams@waterboards.ca.gov

Central Valley Water Board Irrigated Regulatory Lands Program

- New drinking water well monitoring requirements beginning January 1, 2019
  - Starts in the East San Joaquin Coalition (Madera, Mariposa, Merced, and Stanislaus counties)
- On-farm drinking water wells must be monitored for nitrate
- ELAP-accredited laboratories will enter grower information and nitrate results into GeoTracker database
  - The Water Board is developing a new portal for this effort
- Regulation will impact all Central Valley Coalitions within 5 years
- For more information, contact Robert Ditto at robert.ditto@waterboards.ca.gov

Looking Back – Expert Panel Recommendations

- Establish internal management system
- Adopt laboratory accreditation standard
- Ensure relevant analytical methods
- Enhance Communication
- ***Expand Resources***

Expand Resources

- Recent Staffing Updates
  - Eric Yee, Environmental Scientist serving as ELAP Quality Assurance Officer
  - Andrew Hamilton, Environmental Scientist in the Program Development, Research, and Enforcement Unit
- Executed our Assessor Training Contract
  - To improve the quality of ELAP assessments
  - Also to reduce the backlog of drinking water laboratory assessments
- PT Unit progress
- Enforcement update

Assessor Training Contract Progress

- We continue to receive positive feedback
  - Still working on report timing – some have been delayed
- ELAP assessors have been observing up to this point
- They will be evaluated by NV5 staff on upcoming assessments
  - This will establish a baseline of their performance
- Mentoring will follow where duties are shared between NV5 and ELAP staff
  - ELAP will gradually take on the leading role

Assessor Training Contract Progress

ELAP Assessor Training Contract Progress (October 30, 2017 - June 30, 2018)	
On-Site Assessments Completed	76
Upcoming On-Site Assessments Confirmed	19
Draft Reports In Progress	21
Final Reports Sent to Laboratories	54
Acceptable Corrective Action Responses Received	21
Unacceptable Corrective Action Responses Received	CAP1 – 13 / CAP2 - 2
Corrective Action Response Reviews in Progress	CAP1 – 8 / CAP2 - 6

Assessor Checklists

- We received checklists for some drinking water methods as part of our training contract
  - Both ELAP and NV5 assessors are using these during on-sites

- Laboratories are required to know the full method, not just the checklists

Ongoing Issues with Proficiency Testing Compliance

- A result of creating the PT Unit is that now we have a clearer picture of compliance with current PT requirements

- For renewal application PTs, 74% of laboratories have at least one PT deficiency
  - Did not participate in a PT study
  - Obtained an unacceptable evaluation in a study and did not complete a successful second attempt prior to deadline
  - Made errors in reporting PT study results:
    - Reported an incorrect method
    - Entered the wrong value for an analysis
    - Error in placement of decimal in reporting results

- For Annual PTs – 64% of laboratories have at least one deficiency

Enforcement Update

- Settlement in laboratory fraud criminal case
  - Laboratory director pled guilty to one felony charge
  - Significant financial penalty
  - Also ordered to perform 60 days of community service

- Other recent ELAP investigations have found
  - Failure to notify water systems within the designated time frame (for bacterial monitoring results)
  - Failure to adhere to the Quality Assurance Manual
  - Potential fraud (dry-labbing)

ELTAC WORKGROUP UPDATE – METHOD DETECTION LIMITS

Presented by David Kimbrough, Pasadena Water and Power

Workgroup Members: Gail Cho, Huy Do, Miriam Ghabour, David Kimbrough

DRAFT:

METHOD DETECTION LIMIT (MDL) REQUIREMENTS FOR CA ELAP FOTS:

ELTAC WORKGROUP:
DAVID KIMBROUGH, MIRIAM GHABOUR, HUY DO, GAIL CHO

CA ELAP REPRESENTATIVE:
ANGELA ANAND

The use of the Method Detection Limit (MDL) is for the determination of laboratory compliance with accreditation requirements. The following guidance includes requirements, clarification, and permissions to facilitate implementation, regardless of the intent of the regulation.

1) All laboratories accredited under Fields of Testing pertaining to Clean Water Act compliance monitoring for the Regional Water Quality Control Board, State Water Resources Control Board – Division of Water Quality, or other related agencies (Title 22 § 64823 Fields of Testing 16 through 19, also known as Fields of Testing 108-111) must use the new procedure for determining the Method Detection Limit as described in the 2017 Method Update Rule for all methods where the MDL is required. The MDL procedure is not applicable to methods that do not produce results with a continuous distribution, such as, but not limited to, methods for whole effluent toxicity, presence/absence methods, and microbiological methods that involve counting colonies. The MDL procedure also is not applicable to measurements such as, but not limited to, biochemical oxygen demand, color, pH, specific conductance, many titration methods, and any method where low-level spiked samples cannot be prepared. MDL determinations using spiked samples may not be appropriate for all gravimetric methods (e.g., residue or total suspended solids), but an MDL based on method blanks can be determined in such instances. The new MDL procedure should be used by any laboratory using any method that is being reported to Regional Water Quality Control Board, State Water Resources Control Board – Division of Water Quality, or other related agencies for compliance purposes irrespective of whether the method is promulgated specifically for this application.

2) All laboratories accredited under Fields of Testing pertaining to Toxic Substance Control Act, Resource Conservation and Recovery Act, and Comprehensive Environmental Response, Compensation, and Liability Act compliance monitoring for the Department of Toxic Substance Control Act or other related agencies (Title 22 § 64823 Fields of Testing 8 through 13, also known as Fields of Testing 114-118) should use the Method Detection Limit as described in SW-846 Chapter 1 Third Update. The MDL procedure also is not applicable to measurements such as, but not limited to pH, specific conductance, many titration methods, flammability, corrosivity, and any method where low-level spiked samples cannot be prepared. Optionally, laboratories that are accredited for methods which require the determination of the MDL may use the new method described in the Method Update Rule without penalty.

3) All laboratories accredited under Fields of Testing pertaining to Safe Drinking Water Act compliance monitoring for the State Water Resources Control Board – Division of Water Quality (Title 22 § 64823 Fields of Testing 1 through 6, also known as Fields of Testing 102-105) and are accredited for methods which require the determination of the MDL may either use the MDL described in those individual methods or the new method described in the Method Update Rule without penalty, with the following exceptions:

When Part 136, Appendix B is explicitly cited by the Code of Federal Regulations (40CFR), the laboratory is required to follow the new procedure for determining the Method Detection Limit as described in the 2017 Method Update Rule. The applicable regulatory citations consist of methods for the analysis of Volatile Organic Compounds (VOC) including vinyl chloride and methods for the analysis of lead and copper.

When Part 136, Appendix B is explicitly cited by the method approved for drinking water analysis, the laboratory is required to follow the new procedure for determining the Method Detection Limit as described in the 2017 Method Update Rule. This is applicable to methods published by EPA and voluntary consensus standard bodies, such as ASTM International and the Standard Methods Committee.

INFORMATIONAL ITEM:
Central Valley Regional Water Quality Control Board – Pyrethroid Basin Plan Amendment

Jessica Mullane, Central Valley Regional Water Quality Control Board

Pyrethroid Basin Plan Amendment

ELTAC Meeting

Jessica Mullane

Central Valley Regional Water Quality Control Board

Outline

- Pyrethroid Basin Plan amendment (BPA)
- Analytical needs

Pyrethroid BPA Development

- Initiated in 2012
- Adopted by the Central Valley Water Board in June 2017
- Adopted by the State Water Board in July 2018
- Expected to be fully effective in December 2018 (following OAL and US EPA review)

Project Area

- Sacramento and San Joaquin River Watersheds
- Over 4.3 million acres of agricultural land
- Over 1.1 million acres of urban land
  - Approximately 80 POTWs
  - Approximately 60 MS4s

Regulatory Components

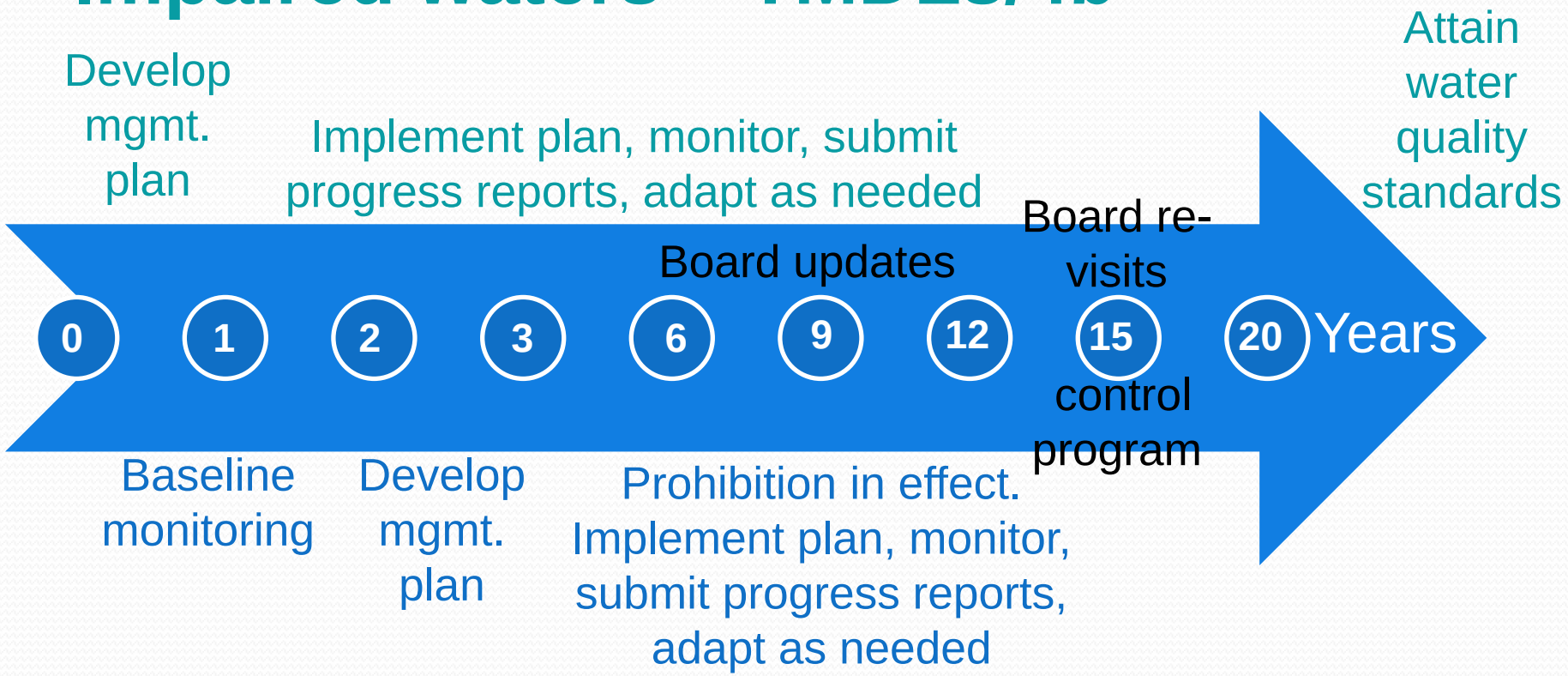
- Addresses impaired waters through:
  - TMDLs in 9 urban waterbodies
  - Category 4b demonstrations for 5 agricultural waterbodies
- Conditional prohibition addresses all significant waterbodies with aquatic life beneficial uses
- Affects dischargers of:
  - municipal stormwater
  - agricultural runoff
  - municipal wastewater

Requirements

- Monitoring (Baseline and Trend)
  - Pyrethroid concentrations
  - TOC and DOC for bioavailability calculations
  - Toxicity testing with *Hyalella azteca* in water and/or sediment
- Develop management plans
- Implement management practices

Regulatory Timeline

Impaired waters – TMDLs/4b



Conditional Prohibition

Monitoring Goals

Determine whether:

- Discharges and/or receiving waters are exceeding pyrethroid concentration goals
- Pyrethroids are causing sediment and/or water column toxicity
- Implementation of management practices are sufficient to meet the pyrethroid concentration goals

Monitoring

Baseline monitoring

- Applies to discharges to non-listed waterbodies
- 0-2 years after BPA adoption
- Determine if discharges exceed trigger

Trend monitoring

- Applies to discharges in listed and non-listed waterbodies
- Ongoing
- Trends in concentration and toxicity
- Effectiveness of management practices
- Cost

Reporting Limits vs. BPA Criteria

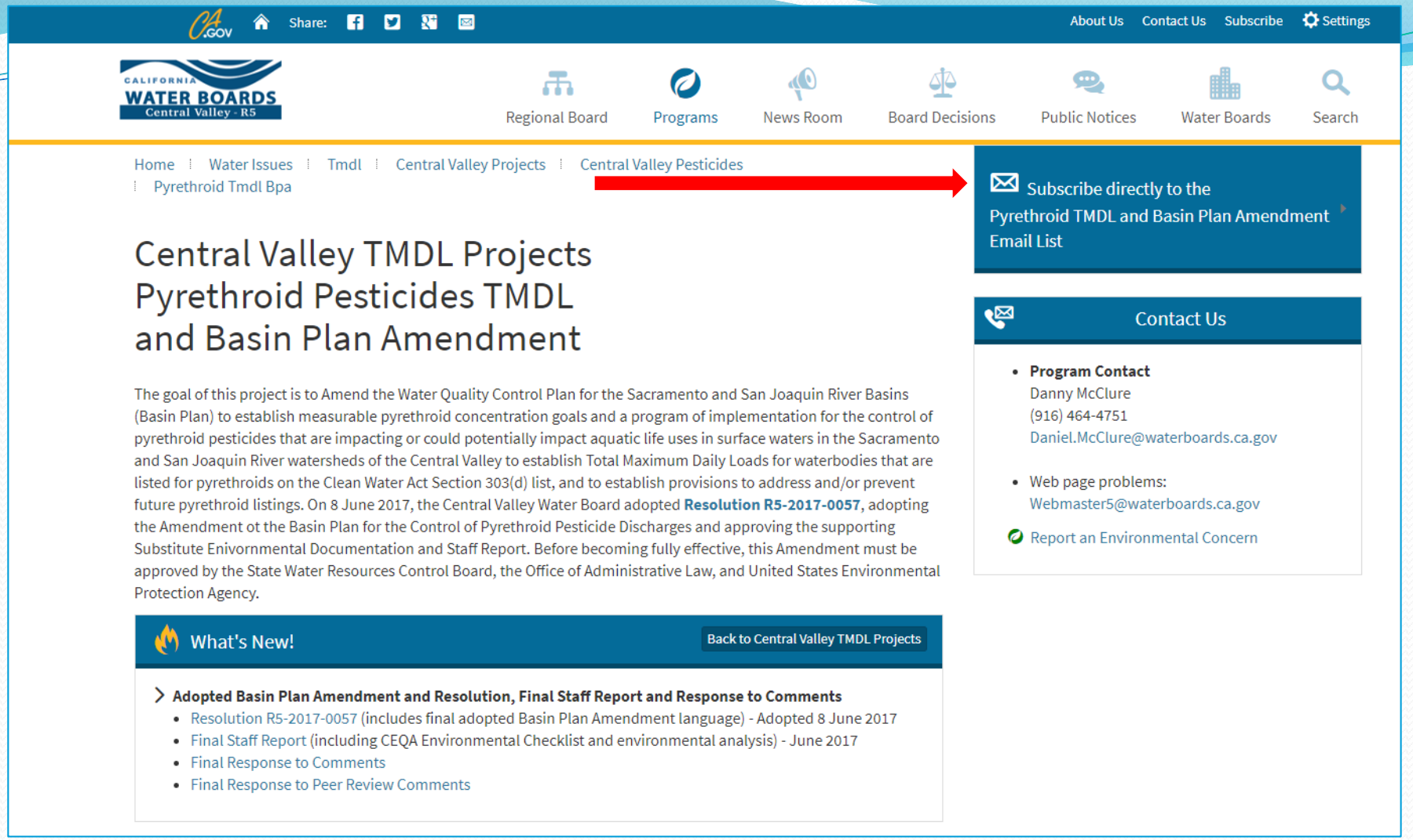
	Current Reporting Limit (ng/L)	Concentration Goals		*Hyalella azteca* LC50 (ng/L)
		Acute (ng/L)	Chronic (ng/L)	
Bifenthrin	1.0	0.8	0.1	0.5
Cyfluthrin	2.0	0.8	0.2	0.55
Cypermethrin	5.0	1	0.3	0.56
Esfenvalerate	5.0	2	0.3	0.85
Lambda-cyhalothrin	2.0	0.7	0.3	0.3
Permethrin	5.0	6	1	7

Expected Analysis

- Increased demand for pyrethroid analysis for both baseline and trend monitoring following BPA adoption
  - TOC and DOC
  - *Hyalella* toxicity testing (water column and sediment)
- Commercial analytical methods are greater than BPA criteria
- Need more sensitive methods with lower detection and reporting limits
- May see increase in demand for analysis of alternative insecticides (fipronil, imidacloprid, etc.)

Pyrethroid Research Plan

- Central Valley Water Board must develop a plan for research to refine the pyrethroid BPA within 2 years
- Creating technical stakeholder group to develop Research Plan
- For more information, please subscribe to the Pyrethroid Pesticides TMDL and BPA listserve
- Possible research topics:
  - Precision and inter-laboratory comparability of analytical methods
  - Partition coefficients for bioavailability calculations
  - Temperature, synergist, and mixture effects on toxicity



https://www.waterboards.ca.gov/centralvalley/water_issues/tmdl/central_valley_projects/central_valley_pesticides/pyrethroid_tmdl_bpa/index.html

LUNCH – Resume at 1:15pm

ELTAC BY-LAWS

Amending the By-Laws

- Review is required every two years
- Any proposed amendment must receive a 2/3 majority vote (of all members, including State Agency Partner Representatives)
  - And must be approved by the Deputy Director of the Division of Drinking Water
- After your last meeting, ELAP received feedback from seven members
  - Some comments, but many were posed as questions
  - All were combined into one document for your review
- From there, ELAP drafted the second revision to the ELTAC By-Laws

By-Laws – Revision II

- We agreed with more than half of the comments received
  - Responses to all content-related comments/questions included in packet
- We are requesting ELTAC input on two suggestions made by members
  - Should ELTAC alternates be able to vote in place of the member they are representing?
  - Should the Chairperson vote tally be made public?
- We will finalize based on feedback
  - Vote today or next meeting

THIS VERSION INCLUDES ELTAC COMMENTS FOR INFORMATIONAL PURPOSES ONLY. NOT A DRAFT OF VERSION II BY-LAWS

ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE

BY-LAWS
Adopted 02/04/2016

ARTICLE I

Name

The name of this Committee shall be the Environmental Laboratory Technical Advisory Committee (ELTAC).

ARTICLE II

Bagley-Keene Open Meeting Act

All meetings shall be conducted in accordance with the provisions of the Bagley-Keene Open Meeting Act (Government Code, Title 2, Division 3, Chapter 1 (commencing with Section 11120)), and each member is subject to the provisions of the Bagley-Keene Open Meeting Act. No provision of these By-Laws is intended to nor may be interpreted to conflict with or supplement the Bagley-Keene Open Meeting Act.

ARTICLE III

Objectives and Functions

ELTAC serves to implement objectives and requirements authorized in Section 100863 of the California Health and Safety Code.

ELTAC is established in law to "assist, advise and make recommendations regarding technical, scientific, and administrative matters concerning the accreditation or certification of environmental laboratories." (Health and Safety Code Section 100863) The law further provides that: "Subcommittees of the committee may be appointed consisting of committee members and other persons having particular knowledge of a subject area, for the purpose of assisting the … [State Water Resources Control Board] on special problems and making recommendations to the Committee for consideration in the establishment of rules and regulations."

ELTAC shall assist the State Water Resources Control Board, Division of Drinking Water (hereafter referred to as “Division”), Environmental Laboratory Accreditation

Commented [MK1]: M. Ghabour suggests incorporation of ELTAC Mission Statement

Commented [MK2]: General comment from M Koekemoer: It would be nice if there was some incentive associated with ELTAC membership. These could include simple items, like free parking, a catered lunch, etc. My agency supports my membership however as we change out ELTAC membership and laboratory workloads and costs increase due to regulatory changes, it is probable that it may be harder to find replacements for positions.

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Program (hereafter referred to as "ELAP") by providing advice and making recommendations regarding technical and scientific matters for the establishment of rules and regulations that will ensure the proper administration and enforcement of provisions pursuant to Health and Safety Code, sections 100825-100920 as well as provisions in other statutes that impact environmental laboratory activity.

The Committee shall also function as a means of exchanging information and opinions related to environmental laboratory technology, methods, and practice. In support of this function, ELAP may request ELTAC member laboratories participate in outreach and education efforts and allow assessors the ability to tour their laboratories in order to learn about technologies the assessors have not previously witnessed.

Commented [MK3]: A. Eaton suggests this is not relevant any longer

ELTAC shall assist ELAP in:

A. Developing scientifically rigorous recommendations regarding issues that impact the regulated laboratory community, regulatory agencies, and data users
B. Improving communications and outreach between ELAP and its stakeholder communities
C. The operation and improvement of ELAP
D. The implementation of a performance based, transparent accreditation program that is accountable to ELAP stakeholders

Commented [MK4]: S Clark suggests removal of "operation and" because ELTAC is not assisting with operations.

ARTICLE IV

Membership

A. Types of Members
    1. Designated Environmental Laboratory Accreditation Program Officer (DELAPO)

        A full-time employee of ELAP shall be appointed as the DELAPO by the Deputy Director of the Division of Drinking Water (hereafter referred to as "Deputy Director"). The DELAPO or a designee shall be present at all of the meetings of the Committee and Subcommittees. Meetings may not be conducted in the absence of the DELAPO or designee. Each meeting shall be conducted in accordance with an agenda approved in advance by the DELAPO. The DELAPO is authorized to adjourn any meeting when he or she determines it is in the public's best interest to do so. The DELAPO is not a voting member of the Committee.
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group of persons having an interest in matters before ELTAC. Representatives are voting members of ELTAC.

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4. Chairperson
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Commented [MK5]: M Koekemoer

B. Composition

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There shall be committee members from both Northern and Southern California, and from the following categories: ~~from both~~ publicly and privately ~~-~~owned laboratories, and ~~from~~ laboratories of all sizes. Those serving on ELTAC shall be selected by the Deputy Director based upon their expertise and knowledge of: conformity and standards development, laboratory quality systems and accreditation, analytical methods and methods development, overall analytical

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1. The membership term for Representatives and SRAEs shall be two (2) years unless an appointment is made to fill an un-expired term of a member not completing a term, in which case appointments of less than two (2) years may be made.
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3. The term of the Chairperson shall be one (1) year. The Chairperson shall not have restrictions on the amount of terms that can be served, as this position is elected annually.

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Representatives and SRAEs must have the resources and technical expertise to support participation on ELTAC. Representatives and SRAEs are expected to attend all ELTAC meetings, and provide an oral report out to ELTAC during the October meeting on communication held with their constituents. Failure to provide reports may result in dismissal from ELTAC at the discretion of the Deputy Director. In order to facilitate discussion, Representatives and SRAEs may attend meetings in person or remotely. Failure to attend ELTAC meetings may result in dismissal as outlined in Section E of this Article.

E. Absences and Dismissal

In the event a Representative or SRAE cannot attend an ELTAC meeting, he/she may choose an alternate to attend the meeting. An alternate may speak on behalf of a Representative ~~or SRAE~~ but the alternate's presence does not count toward a quorum. If a Representative or SRAE has sent an alternate in his/her place, that alternate shall not vote on agenda items. If the Chairperson cannot attend an ELTAC meeting, he or she must select an alternate to act as the Chairperson from existing ELTAC membership. A Representative/SRAE may be removed by the Deputy Director or by a 2/3 vote by the voting members on ELTAC. In the event a Representative or SRAE obtains work in a new field or fails to represent his/her constituents, a new Representative or SRAE shall take his/her place in accordance with the process outlined in Article V.

Commented [MK6]: M Boele suggests breakdown be closer to the breakdown of the actual labs accredited by ELAP. Divide the % of commercial labs, DW, WW, Combo DW & WW, PH, etc – and have representatives for each.

Commented [MK7]: A.Eaton suggests a 2 year term would provide more continuity

Commented [MK8]: A .Eaton suggests adding: ELAP shall be responsible for providing the representatives with current contact information for the various constituencies. However representatives may expand those contact lists to include additional interested parties. Representatives shall in turn share their constituent contact lists with ELAP.

Commented [MK9]: M Koekemoer suggests removal of this requirement

Commented [MK10]: Several members not this has not occurred in the past.

Commented [MK11]: A. Eaton notes this is not consistent with Bagley Keene Act

Commented [MK12]: M. Boele suggests allowing alternates to vote

Commented [MK13]: M Ghabour suggests quantitation – failure to attend 3 or more consecutive ELTAC meetings of failure to provide oral report communication with consitituents

Commented [MK14R13]: Similar comment from M. Boele re members who miss multiple meetings

THIS VERSION INCLUDES ELTAC COMMENTS FOR INFORMATIONAL PURPOSES ONLY. NOT A DRAFT OF VERSION II BY-LAWS

ARTICLE V

Appointments, Elections and Voting

A. Representative and SRAE Appointments

ELTAC shall consist of members appointed by the Division of Drinking Water Deputy Director. Applications for Representative and SRAE positions shall be submitted in writing to the DELAPO by no later than the 15th of September. A complete package will include:

1. The applicant's/nominee's full name, title, institutional affiliation, and contact information.
2. The applicant's/nominee's area(s) of expertise.
3. A summary of qualifications (1-2 sentences) outlining the individual's technical expertise and who they would represent. Inclusion of a curriculum vitae or resume is desirable.
4. Letter of recommendation or written endorsement from an organization, association, etc. (optional)

The Deputy Director shall appoint all Representatives and SRAEs after evaluating nominations. The Chief of ELAP, the Deputy Director and the Assistant Deputy Director of the Division of Drinking Water shall evaluate all nominees for eligibility and make their selection based on the most qualified candidate(s). In selecting committee members, executive personnel shall consider candidates who represent the different technical fields within the laboratory community, regulatory agencies, and data users. All nominations shall be made public.

B. Nominating the Chairperson

Before proceeding to the election for the Chairperson, one or more candidates must be nominated by a current Representative or SRAE at the October ELTAC meeting. The nomination must be accepted by the nominee in order to be considered as an eligible candidate in the voting process. When nominations are completed, the voting members, as provided for in these By-Laws, shall elect the Chairperson.

C. Electing the Chairperson

Voting for the Chairperson shall be conducted during the October ELTAC meeting. Each Representative shall be allowed one vote. The Chairperson shall be decided by a simple majority vote. Voting is not binding and the Deputy Director may appoint a different Chairperson if he/she deems it necessary.

Commented [MK15]: M. Ghabour suggests adding more information about details, ie. Frequency, mode of solicitation

Commented [MK16]: S Clark suggests this become an annual occurrence because of term durations and be promoted by ELAP based on positions being filled.

Commented [MK17]: H. Do noted that nomination and election took place at two different meetings

Commented [MK18]: AE suggests replacing October with Fall in all references

Commented [MK19]: M Ghabour suggests tally be made public

Commented [MK20]: M. Boele suggest eliminating the Deputy Director override and either go by a member vote OR by deputy director appointment.

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ARTICLE VI

Operational Procedures

A. Quorum
The presence of one-half plus one of the total members on ELTAC (Representatives and SRAEs) shall constitute a quorum for the transaction of business. In the absence of a quorum, no official action may be taken by the ELTAC.

B. Meetings
1. ELTAC shall meet at least three (3) times a year. The DELAPO shall schedule meetings. One of these meetings shall be held in October.
2. Emergency or special meetings may be scheduled and held in accordance with Article II.
3. Unless otherwise scheduled by the DELAPO, all ELTAC meetings shall reside in Sacramento.
4. The proceedings of ELTAC shall be called to order and adjourned by the DELAPO and shall follow Robert's Rules of Order, newly revised.

C. By-Laws
1. These By-Laws must be reviewed by ELTAC for amendments no less than once every two (2) years.
2. These By-Laws may be amended by a two-thirds (2/3) majority vote of ELTAC's members pending final approval from the Deputy Director.
3. The Deputy Director reserves the right to make amendments to these By-Laws without the ELTAC's consent. ELTAC reserves the right to appeal these amendments to the State Water Resources Control Board during the public comment period of a regularly scheduled Board meeting.

D. Recommendations
1. Any recommendation(s) made to ELAP must be submitted in writing through letter or email to the DELAPO.
2. The DELAPO will respond no later than thirty (30) days after the recommendation has been received. The response shall be posted to the website, as well as emailed to ELTAC. The response shall include whether the DELAPO will accept or deny the recommendation, or if more time is needed.

E. Voting on Agenda Items During ELTAC Meetings
Only Representatives and SRAEs may vote for items on the ELTAC agenda unless ELTAC has decided otherwise in a previous meeting. It shall be a goal of ELTAC to reach a consensus on each agenda item.

F. Subcommittees and Consultants
Subcommittees may be established by ELTAC as needed. Each member of a Subcommittee, including persons who have not been appointed as or designated as

Commented [MK21]: M. Ghabour notes meetings are adjourned by Chairperson

Commented [MK22]: M. Ghabour notes that ELTAC does not follow Robert's Rules of Order.

Commented [MK23]: M Ghabour suggests adding clarification about what these recommendations are.

Commented [MK24]: M. Boele notes that this is not consistent with committee practice.

Commented [MK25]: Several members noted that this section is in conflict with Article IV.A.3

Representatives or SRAEs of ELTAC, must also comply with the provisions stated in Article II. Subcommittee members shall be appointed by the DELAPO. Membership on such Subcommittees may include members of the public; however, there must be at least one Representative or SRAE on any Subcommittee. All Subcommittee meetings shall be conducted in accordance with Article II. Only Subcommittee members may vote on issues before the Subcommittee. The DELAPO may request consultants to present information at a meeting of ELTAC or a meeting of a Subcommittee.

G. Regulations

Where possible, ELAP shall seek advice from ELTAC on all regulations and fees developed by ELAP related to environmental laboratory technology and practice. ELTAC may (by action taken at a public meeting) request that its comments on proposed regulations be submitted to the State Water Resources Control Board, and the DELAPO shall do so upon request ~~submit the comments to the State Water Resources Control Board~~. Individual members of ELTAC retain their right as a member of the public to submit comments on proposed regulations.

H. Minutes

A record shall be made by the Scribe of actions taken at each meeting by ELTAC and Subcommittee(s). The record shall then be posted in draft form on ELAP's website (www.waterboards.ca.gov/elap) until it can be approved by ELTAC. The minutes may only be approved at an ELTAC meeting or Subcommittee meeting whose actions are described in the minutes. The DELAPO shall designate a person to act as Scribe for each closed session of the ELTAC and any Subcommittee.

Commented [MK26]: M Ghabour notes that this is not consistent with current committee practice.

Commented [MK27R26]: Same comment from S. Clark

Commented [MK28R26]: Similar comment from A. Eaton. Suggests adding workgroups to by-laws in addition to subcommittees

Commented [MK29]: A. Eaton suggests adding that the record shall identify topics of discussion even if no action was taken.

Commented [MK30]: A .Eaton suggests adding that draft minutes be posted within 30 days of meeting

Commented [MK31]: S. Clark noted that this has not been occurring.

ELAP Response to ELTAC Member Comments on By-Laws Revision
July 18, 2018 ELTAC Meeting

ACCEPTED	Section	Commenter	ELAP Comments
Add Mission Statement	Beginning of document	M. Ghabour	Agree
Remove "operation and"	Article III.C	S. Clark	Agree
ELAP shall provide representatives with consitutency contact information, and ELTAC members shall share constituency lists with ELAP upon request.	Article IV.D	A. Eaton	Agree
Remove "or remotely" because it is inconsistent with the Bagley Keene Act.	Article IV.D	A. Eaton	Agree
Remove references to SRAEs participation in voting	Article IV.E;	Several members	Agree
Quantitation of ELTAC expectations - dismissal if a member fails to attend three or more meetings or fails to provide a report out on constituency communications	Article IV.E	M. Ghabour; M. Boele	Agree
Add annual frequency to representative applications. Add that ELAP will advertise vacancies	Article V.A	M. Ghabour; S.Clark	Agree
Nomination and election of ELTAC chairperson take place at two consecutive meetings, not the same meeting	Article V.B and Article V.C	H. Do	Agree
Replace references to "October" meeting with "Fall"	Article IV.D; Article V.B; Article V.C; Article VI.B.4	A. Eaton	Agree
Chairperson adjourns meetings, not DELAPO	Article VI.B.4	M. Ghabour	Agree
Add clarity regarding what a "recommendation" is	Article VI.D	M. Ghabour	Agree
Add requirement that draft minutes be posted within 30 days of meeting	Article VI.H	A. Eaton	Agree

REJECTED	Section	Commenter	ELAP Comments
Incentivize with free parking and lunch.	General comment	M. Koekemoer	California Health and Safety Code specifies that serving on ELTAC members serve without compensation and shall pay their own expenses incurred as a result of attending meetings or engaging in other committee-related activies. HSC 100863
Removal of the ability for ELAP to request ELTAC member laboratories participate in outreach or training efforts.	Article III	A. Eaton	ELAP wants to retain the ability to make this request. Other industries are supported by their specific laboratory community and ELTAC should similarly support ELAP.
Chairperson term should be two years instead of one year	Article IV.C.3	A. Eaton	One year term is necessary to avoid conflict with the end of a member's two year term.
The Scribe shall provide agenda 14 days prior to meeting	Article IV.A.5	M. Koekemoer	This requirement already exists. ELAP is required to notice the the meeting agenda 10 days prior by the Bagley Keene Act. ELAP's current practice is to formally notice ten business days prior even though it is not required. This often ends up being around 14 days.

ELAP Response to ELTAC Member Comments on By-Laws Revision
July 18, 2018 ELTAC Meeting

REJECTED	Section	Commenter	ELAP Comments
Breakdown of membership should be closer to breakdown of accredited laboratories	Article IV.B	M. Boele	The By-Laws already ensure this is done. Current composition of ELAP laboratories is 44% commercial and 56% municipal. Current ELTAC composition of laboratory reps is 50% commerical and 50% municipal. DW, WW, HW laboratories often overlap.
Removal of requirement for oral report outs on constinuency communications	Article IV.D	M. Koekemoer	This will occur every fall beginning 2018. ELAP wants to retain this mechanism to ensure members are performing their duties.
Eliminate Deputy Director ability to override committee on election of Chairperson. Make it either a binding vote or the Deputy Director's duty.	Article V.C	M. Boele	The Deputy Director should retain this ability.
ELTAC does not follow Robert's Rules of Order	Article VI.B.5	M.Ghabour	Disagree - ELTAC does follow RRO.
Reconsider requirement to submit recommendations in writing to ELAP	Article VI.D.2	M. Boele	ELAP prefers a formal recommendation in writing to support clear communications between ELTAC and the program
Comments regarding removal of subcommittee requirements or addition of workgroup related items	Article VI.F	M.Ghabour; S. Clark; A. Eaton	Subcommittees are establishe by the Bagley-Keene Act and must be addressed in the By-Laws. Working groups are informal and do not need to be captured or governed by the By-Laws.
Add record of discussion topics even if no actions is taken	Article VI.H	A. Eaton	Minutes currently do capture each agenda item even if an action is not taken. For a complete record of committee member comments, a video recording of each meeting is posted on the ELAP website following each meeting.

INPUT NEEDED	Section	Commenter	ELAP Comments
Allow alternates to vote?	Article IV.E	M. Boele	Seeking ELTAC input
Make Chairperson vote tallies public?	Article V.C	M. Ghabour	Seeking ELTAC input

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ENVIRONMENTAL LABORATORY TECHNICAL ADVISORY COMMITTEE

BY-LAWS
Adopted 02/04/2016
Revised xx/xx/xxxx

Mission Statement: ELTAC serves to facilitate transparency, as an inclusive conduit for the fair and balanced exchange of information and dialogue between the laboratory community, California regulatory agencies, data users, and ELAP. ELTAC works to provide support, critical stakeholder review, scientifically valid advice, and unbiased guidance to ELAP on technical issues and the foreseeable effects that ELAP regulatory decisions may have, to ensure public health and environmental protection. ELTAC partners with ELAP to create and maintain a high-quality accreditation program to meet the needs of the laboratory community, California regulatory agencies, and data users.

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Representatives and SRAEs must have the resources and technical expertise to support participation on ELTAC. Representatives and SRAEs are expected to attend all ELTAC meetings, and provide an oral report out to ELTAC during the ~~October~~ Fall meeting on communication held with their constituents. ELAP shall provide representatives with constituent contact information at the beginning of a member's term. Representatives may expand their contact list to include additional interested parties and will share their constituent list with ELAP upon request. Failure to provide reports may result in dismissal from ELTAC at the discretion of the Deputy Director. ~~In order to facilitate discussion, Representatives and SRAEs may attend meetings in person~~Meetings must be attended in person ~~or remotely~~. Failure to attend ELTAC meetings may result in dismissal as outlined in Section E of this Article.

E. Absences and Dismissal

In the event a Representative or SRAE cannot attend an ELTAC meeting, he/she may choose an alternate to attend the meeting. An alternate may speak on behalf of a Representative ~~or SRAE~~ but the alternate's presence does not count toward a quorum. If a Representative or SRAE has sent an alternate in his/her place, that alternate shall not vote on agenda items. If the Chairperson cannot attend an ELTAC meeting, he or she must select an alternate to act as the Chairperson from existing ELTAC membership. A Representative/SRAE may be removed by the Deputy Director or by a 2/3 vote by the voting members on ELTAC. In the event a Representative or SRAE obtains work in a new field or fails to represent his/her

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constituents by missing three consecutive ELTAC meetings or failing to provide a report out on constituency communications, a new Representative or SRAE shall take his/her place in accordance with the process outlined in Article V.

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ARTICLE V

Appointments, Elections and Voting

A. Representative and SRAE Appointments
ELTAC shall consist of members appointed by the Division of Drinking Water Deputy Director. Applications for Representative and SRAE positions shall be submitted annually in writing to the DELAPO by a date specified by ELAP but no later than ~~the 15th of September~~90 days prior to the start date of a new membership term. Vacancies will be advertised by ELAP to the laboratory community. A complete package will include:

Commented [MK1]: Adding flexibility since most, but not all, terms begin in March.

1. The applicant's/nominee's full name, title, institutional affiliation, and contact information.
2. The applicant's/nominee's area(s) of expertise.
3. A summary of qualifications (1-2 sentences) outlining the individual's technical expertise and who they would represent. Inclusion of a curriculum vitae or resume is desirable.
4. Letter of recommendation or written endorsement from an organization, association, etc. (optional)

The Deputy Director shall appoint all Representatives and SRAEs after evaluating nominations. The Chief of ELAP, the Deputy Director and the Assistant Deputy Director of the Division of Drinking Water shall evaluate all nominees for eligibility and make their selection based on the most qualified candidate(s). In selecting committee members, executive personnel shall consider candidates who represent the different technical fields within the laboratory community, regulatory agencies, and data users. All nominations shall be made public.

B. Nominating the Chairperson
Before proceeding to the election for the Chairperson, one or more candidates must be nominated by a current Representative or SRAE at the meeting preceding the Fall ~~October~~ ELTAC meeting. The nomination must be accepted by the nominee in order to be considered as an eligible candidate in the voting process. When nominations are completed, the voting members, as provided for in these By-Laws, shall elect the Chairperson.

C. Electing the Chairperson
Voting for the Chairperson shall be conducted during the ~~October~~ Fall ELTAC meeting. Each Representative shall be allowed one vote. The Chairperson shall be decided by a simple majority vote. Voting is not binding and the Deputy Director may appoint a different Chairperson if he/she deems it necessary.

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ARTICLE VI

Operational Procedures

A. Quorum
The presence of one-half plus one of the total members on ELTAC (Representatives and SRAEs) shall constitute a quorum for the transaction of business. In the absence of a quorum, no official action may be taken by the ELTAC.

B. Meetings
1. ELTAC shall meet at least three (3) times a year. The DELAPO shall schedule meetings. One of these meetings shall be held in ~~October~~ the Fall.
2. Emergency or special meetings may be scheduled and held in accordance with Article II.
3. Unless otherwise scheduled by the DELAPO, all ELTAC meetings shall reside in Sacramento.
4. The proceedings of ELTAC shall be called to order and adjourned by the ~~DELAPO~~ Chairperson and shall follow Robert's Rules of Order, newly revised.

C. By-Laws
1. These By-Laws must be reviewed by ELTAC for amendments no less than once every two (2) years.
2. These By-Laws may be amended by a two-thirds (2/3) majority vote of ELTAC's members pending final approval from the Deputy Director.
3. The Deputy Director reserves the right to make amendments to these By-Laws without the ELTAC's consent. ELTAC reserves the right to appeal these amendments to the State Water Resources Control Board during the public comment period of a regularly scheduled Board meeting.

D. Recommendations
1. A recommendation is any endorsement by ELTAC of action or policy adoption on behalf of ELAP. A recommendation must contain detail about the action the committee is recommending ELAP take. A 2/3 passing vote is required.
~~1.~~2. Any recommendation(s) made to ELAP must be submitted in writing through letter or email to the DELAPO.
~~2.~~3. The DELAPO will respond no later than thirty (30) days after the recommendation has been received. The response shall be posted to the website, as well as emailed to ELTAC. The response shall include whether the DELAPO will accept or deny the recommendation, or if more time is needed.

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E. Voting on Agenda Items During ELTAC Meetings
Only Representatives ~~and SRAEs~~ may vote for items on the ELTAC agenda unless ELTAC has decided otherwise in a previous meeting. It shall be a goal of ELTAC to reach a consensus on each agenda item.

F. Subcommittees and Consultants
Subcommittees may be established by ELTAC as needed. Each member of a Subcommittee, including persons who have not been appointed as or designated as

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Representatives or SRAEs of ELTAC, must also comply with the provisions stated in Article II. Subcommittee members shall be appointed by the DELAPO. Membership on such Subcommittees may include members of the public; however, there must be at least one Representative or SRAE on any Subcommittee. All Subcommittee meetings shall be conducted in accordance with Article II. Only Subcommittee members may vote on issues before the Subcommittee. The DELAPO may request consultants to present information at a meeting of ELTAC or a meeting of a Subcommittee.

G. Regulations

Where possible, ELAP shall seek advice from ELTAC on all regulations and fees developed by ELAP related to environmental laboratory technology and practice. ELTAC may (by action taken at a public meeting) request that its comments on proposed regulations be submitted to the State Water Resources Control Board, and the DELAPO shall do so upon request ~~submit the comments to the State Water Resources Control Board~~. Individual members of ELTAC retain their right as a member of the public to submit comments on proposed regulations.

H. Minutes

A record shall be made by the Scribe of actions taken at each meeting by ELTAC and Subcommittee(s). The record shall then be posted in draft form on ELAP's website (www.waterboards.ca.gov/elap) within 30 days following a meeting and until it can be approved by ELTAC. The minutes may only be approved at an ELTAC meeting ~~or Subcommittee meeting~~ whose actions are described in the minutes. The DELAPO shall designate a person to act as Scribe for each closed session of the ELTAC and any Subcommittee.

ELAP SECOND PRELIMINARY DRAFT REGULATIONS

Jacob Oaxaca, ELAP

Overview

- Status Update
- Projected timeline
- Second Preliminary Draft Regulations
  - What changed since First Preliminary Draft
  - What stayed the same
  - Items for additional development/requests for ELTAC input

Status Update

- ELAP completed a Second Preliminary Draft, which incorporates changes based on feedback from ELTAC members and stakeholders on the first preliminary draft
  - We accepted three-fourths of comments received
- Revisions made include:
  - Policy changes
  - Clarifications and corrections
  - Logistical considerations
- ELAP will consider additional revisions based on ELTAC feedback before public release

Responding to Comments

- We have received feedback from both ELTAC members and the laboratory community during this regulatory development process
  - Thank you - these comments have been incredibly valuable
- Comments on both preliminary drafts are used as development tools to prepare the Final Draft text
- The Final Rulemaking Package will include a formal Response to Comments
  - Responses to comments on both preliminary drafts and the Final draft will be included

Projected Timeline

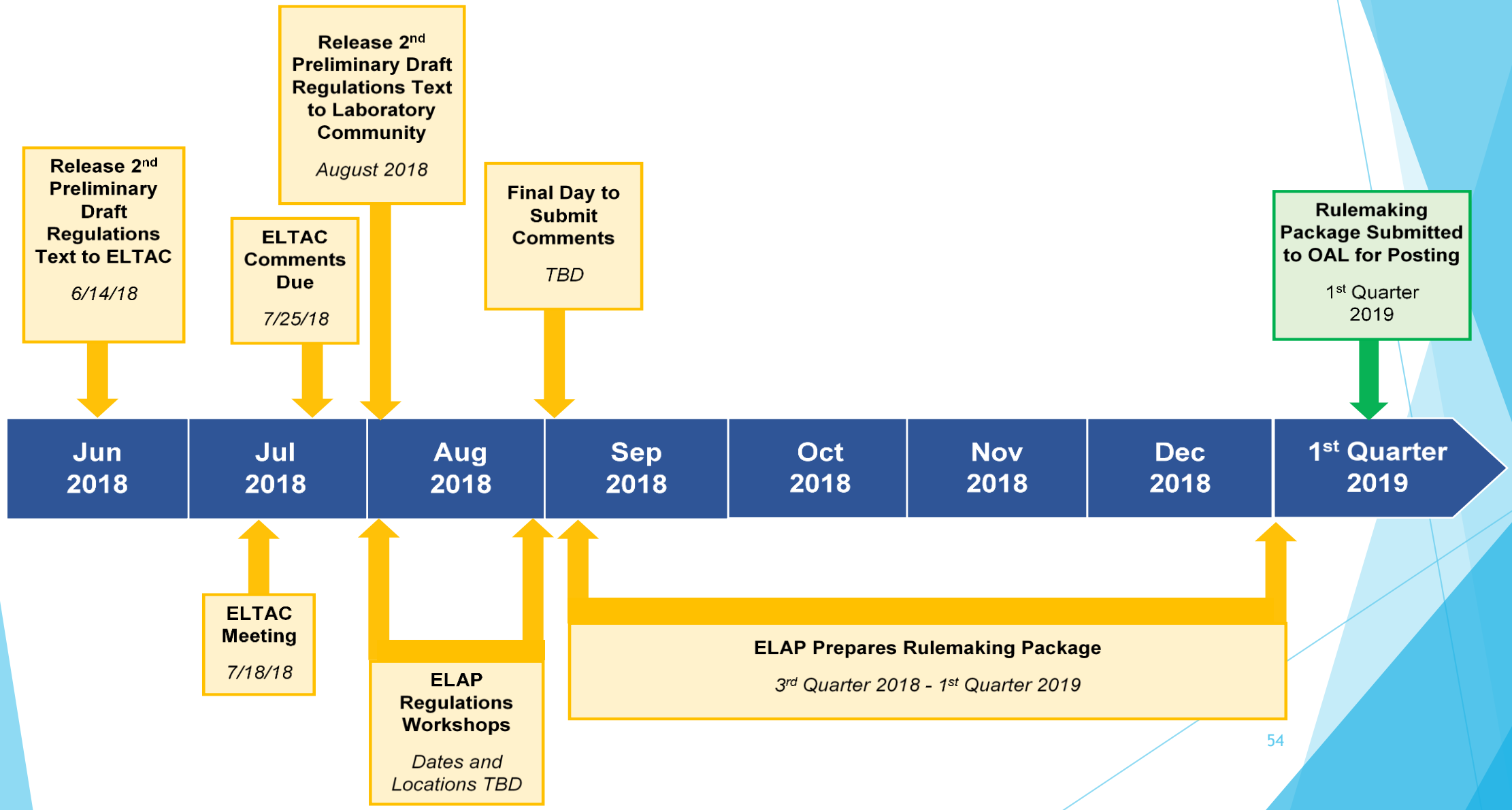
- ELTAC member comments on Second Preliminary Draft due to ELAP by July 25, 2018
- We anticipate releasing to the community in August 2018
  - This will begin a 30 day public comment period
- ELAP will hold four public workshops following public release
- Following close of public comment period, ELAP prepares the official rulemaking package
  - Applicable comments and suggestions will be incorporated into Final Draft
- We expect to enter the formal rulemaking process in the first quarter of 2019

Public Workshops

- ELAP staff will present and review with the stakeholder community
  - To ensure the text is clear and complete
  - We will solicit comments and answer questions

- Four tentative locations (dates to be determined)
  - Redding
  - Sacramento (this workshop will be webcast)
  - Los Angeles
  - Fresno

Preliminary Activities (Dates Subject to Change)



Rulemaking Process (Dates Subject to Change)

- ELAP Submits Rulemaking Package to OAL for Posting
- 45 Day Public Comment Period
- Public Hearing Held at a State Water Board Workshop (Opportunity to Comment)

- OAL Reviews and Approves Rulemaking Package
- OAL Transmits Rulemaking Package to the Secretary of State for Filing

- ELAP Finalizes Rulemaking Package (Including Formal Response to Comments)
- State Water Board Votes on Resolution Approving Regulations at a State Water Board Meeting (Opportunity to Comment)
- ELAP Submits Final Rulemaking Package to OAL

Regulations Become Effective

Second Preliminary Draft Regulations

- ELAP performed extensive review and consideration of comments received on the First Preliminary Draft

- Three buckets for purposes of discussion today
  - Changes we made based on comments
  - Changes we declined to make (and why)
  - Items we want further input on

- We will take questions and comments on other sections of the preliminary draft regulations at the end of this presentation

Summary of Changes Made Based on Your Comments

- Removal and addition of requirements
- Extension of timelines
- Expansion of text to be more descriptive and specific
- Formatting changes
- Correction of errors (grammar, spelling, and reference mistakes)

Examples of Changes We Made

Section	Clause	Revision	Why
64801.00	Definitions	Expanded on "Sophisticated Technology"	Elaboration - previous definition was perceived as open to interpretation.
		Removed "Unit of Accreditation"	Policy - previous text inconsistent with 2016 TNI Standard.
64802.05	Application Package	Added requirement for "agreement to comply with ELAP statutes and regulations"	Policy - adds accountability for accredited laboratories including reciprocity accreditation.
64802.10	Quality Systems	Removed priority accreditation status	Policy - priority accreditation perceived as preferential treatment.
		Changed quarterly audit report requirement to an annual audit report requirement for non-TNI quality systems	Policy - consensus opposition from stakeholders. Annual audit reports will satisfy State Agency Partner's needs during transition to 2016 TNI Standard.

Examples of Changes We Made

Section	Clause	Revision	Why
64802.20	Proficiency Testing	Replaced language of "two consecutive PT studies" with "second attempt" and referenced TNI Standards	Clarification - confusion with definition of "two consecutive."
		Increased time frame for corrective actions on "not acceptable" PT results to 30 days	Logistical - Seven days not enough time to order, receive, perform tests, and report PTs.
		Revised and expanded requirements for failed PT	Policy - previous text did not adequately address State Agency Partner needs.
64802.25	On-site Assessments	Added language for an "Assessment Firm" and associated fee structure.	Clarification - previous text did not describe option for use of an Assessment Firm.
		Added option for Corrective Action Plan	Logistical - applicable to findings that are not correctable within 30 days.
		Changed text to "scheduled on-site assessment"	Clarification - previous text did not specify when this clause applies.

Examples of Changes We Made

Section	Clause	Revision	Why
64808.00	Initial Accreditation	Time frame to submit corrections for initial applications increased to 30 days	Logistical - provides laboratories with additional time to respond to missing elements of application package.
64810	Types of Laboratories	Renamed "Stationary" Laboratory to "Main" Laboratory and	Policy - previous text inconsistent with industry terminology.
		Renamed "Auxiliary" Laboratory to "Satellite" Laboratory	Policy - previous text inconsistent with industry terminology.
64810.05	Satellite Laboratories	Removed requirement to receive samples from the main laboratory only	Policy – requirement inconsistent with intent.
64812.00	Laboratory Equipment	Changed requirement from notify ELAP of a change in "sophisticated technology" to update internal documents to reflect change	Policy - expected frequency of notification creates unnecessary work for laboratories and ELAP.

Criteria We Used When Declining to Make Changes

- Recommendations were outside the scope of regulation
- Suggestions were inconsistent with State Board or Regulatory Agency priorities or direction
- Conflicting with internal program operations
- Sufficient justifications in text or references already exist

Examples of Changes We Declined

Section	Clause	Suggested Revision	Justification
64801.00	Definitions	Retain use of the term Laboratory Director instead of Technical Manager	Use of the term Technical Manager is consistent with 2016 TNI Standard.
64802.00	Accreditation Criteria	Change period of accreditation to either 12 or 36 months (except for interim and reciprocity)	Statutory requirement is 24 months.
64802.10	Quality Systems	Remove quality systems requirements in accordance with 2016 TNI Standard Volume 1	Selection of 2016 TNI Standard meets State Agency needs, is one of the recommended options from the Expert Review Panel, and is supported by State Board.

Examples of Changes We Declined

Section	Clause	Suggested Revision	Justification
64802.20	Proficiency Testing	Require two acceptable results for PTs every year	Modification of 2016 TNI Standard to require only one PT per year supported by stakeholders and State Board.
		Specify what is required for Demonstration of Performance for California analytes	Language allows flexibility for accreditation of non-Standard methods/analytes.
64802.25	On-site Assessment	Require every 1 or 2 years	Three year frequency is aligned with USEPA requirements. Three years is the maximum time frame and does not preclude ELAP from assessing a laboratory more frequently.
64812.00	Laboratory Personnel	Extend Technical Manager absence to > 15 days	Technical Manager absence > 15 days, must have a temporary replacement; >35 days, written notification to ELAP is consistent with 2016 TNI Standard.

Items We Want Further Input On

- We are requesting ELTAC feedback and recommended language on several items

- We see these as grey areas
  - The current text may not reflect the intent

- Questions to consider
  - Is there justification for the regulation?
  - Does it agree with other areas of the regulation?
  - Does is meet the needs of the regulatory community?
  - Does it work for the laboratory community (logistically, financially)?
  - Does it work for ELAP (logistically, resources)?

Renewal Application Package Submittal

Section	64802.05
Clause	Application Package
Proposed Text	"…laboratories will be required to submit renewal application packages July1 through August 31."

- What are your logistical concerns for laboratories with the proposed submittal window for renewal applications?

Ethics and Integrity Clause

Section	64802.10(a)(2)(A)(ii)
Clause	Quality Systems
Proposed Text	Quality Assurance Manual requirements (from existing regulations) do not include ethics and integrity requirements

- Should an ethics and integrity clause be included in the Quality Assurance Manual requirements for non-TNI quality systems?

Amendment Accreditation for Satellite or Mobile Laboratories

Section	64808.10
Clause	Amendment Accreditation
Proposed Text	For addition of satellite or mobile laboratories: "**If at ELAP's discretion** an on-site assessment is conducted, the laboratory shall comply with Section 64802.25."

- ELAP is not precluded from conducting and OSA
  - The intent is for flexibility if there is justification

- Is there justification for why an OSA should or should not be discretionary?

Satellite Laboratory Location

Section	64810.05(a)(6)
Clause	Satellite Laboratory
Proposed Text	The main laboratory and satellite laboratory are located within the same county

- Criteria must include a defined boundary that allows for oversight by the Main laboratory
- Should ELAP consider an alternative distance criteria?
  - If so, what?

Notification and Reporting of Results

Section	64814.00(d)
Clause	Notification, Reporting, and Records Retention.
Proposed Text	A laboratory shall report to its clients in accordance with the request for analysis, the full and complete results of all **detected** contaminants and pollutants from the analyses of the sample or components thereof.

- The intent is that all results, whether detected or non-detected, should be reported to the client in accordance with the request of analysis

- How should the text be revised to reflect the intent?

Notification of Clients by Subcontracted Laboratories

Section	64814.00(f)(3)
Clause	Notification, Reporting, and Records Retention.
Proposed Text	The subcontractor shall provide the required notification in accordance with subdivision (h), below, unless there is an arrangement in writing that the subcontracting laboratory will provide the required notification.

- The intent is to ensure timely notification of results
- Should the default for accountability of timely notification be with the subcontracting laboratory or the subcontractor laboratory?

Notification Method

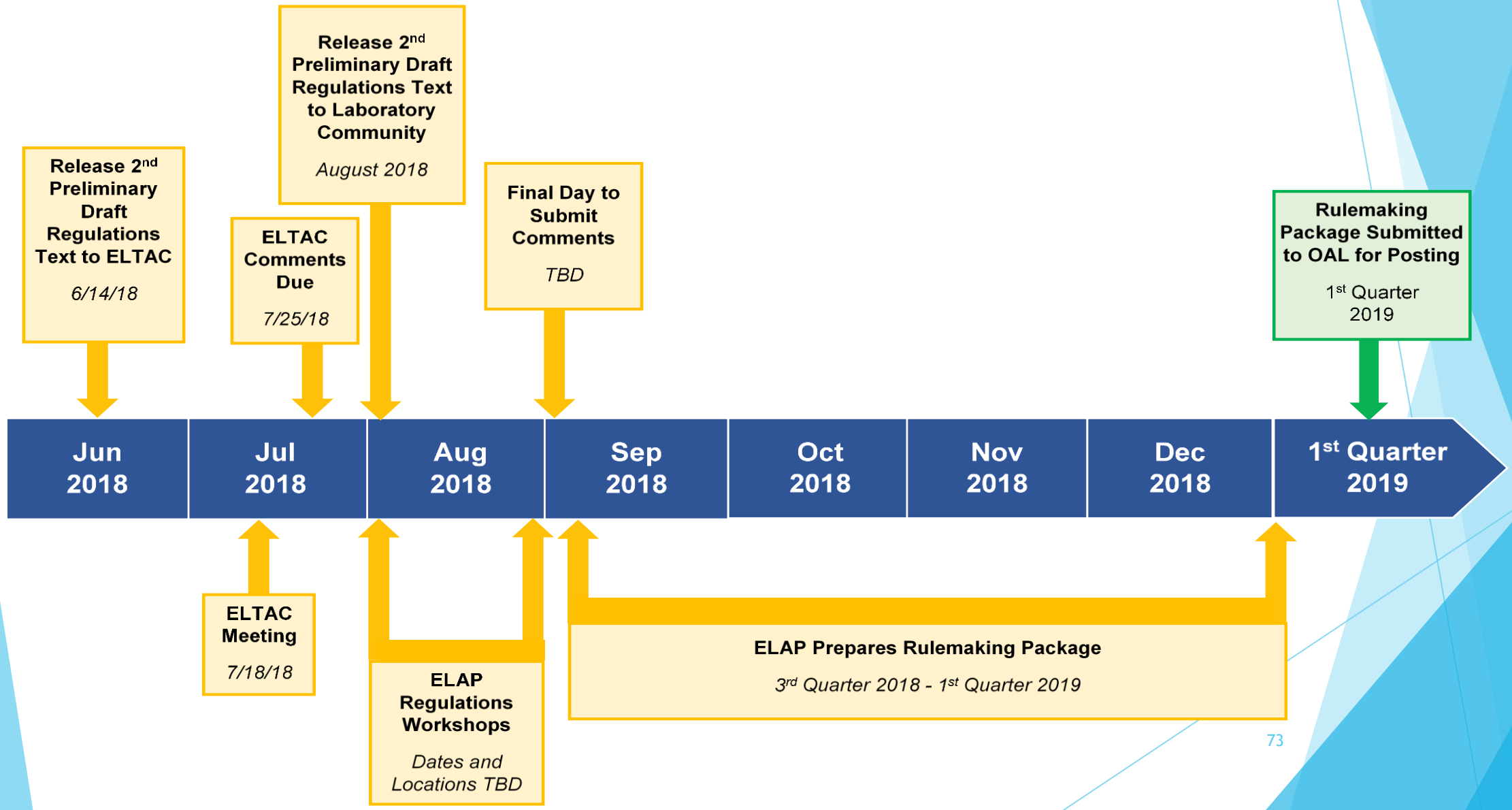
Section	Various
Clause	Various
Proposed Text	Required use of registered mail as proof of notification by the laboratory

- Should alternatives to registered mail be allowed?
- If so, what form would be acceptable and under what circumstances?

Next Steps

- Potential revisions based on ELTAC feedback
- Release Second Preliminary Draft text to the public
  - Anticipate releasing in August
  - The release opens a 30-day public comment period
- Stakeholder workshops
- Finalize text based on accepted stakeholder feedback and prepare rulemaking package
- Enter formal Rulemaking Process in early 2019

Preliminary Activities (Dates Subject to Change)



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Regulations Become Effective

Further Questions or Comments?

INFORMATIONAL ITEM: Independent 2017 Survey of ELAP Laboratories

Amber Baylor, South Orange County Wastewater Authority

Welcome

- Thank you Amber, for this independent undertaking
  - ELAP is always trying to improve
- We don’t agree with everything in the survey or paper, however, we see its value
- We are asking ELTAC to prioritize high-to-low the takeaways from Amber’s project

2017 ELAP Survey White Paper

June 2018

Executive Summary:

This white paper is a culmination of the results of a 2017 survey of ELAP accredited laboratories that served as a tool to engage the laboratory community in California to share their professional expertise as it relates to regulatory and analytical compliance under the Clean Water Act (CWA)[1] and the Safe Drinking Water Act (SDWA)[2]. Of the survey respondents 68% are focused on compliance measures related to the CWA, SDWA or both. The Environmental Laboratory Accreditation Act (ELAA)[3] was passed in 1988 which laid the framework for third part auditing as a mechanism for California to ensure the protection of public health and the environment from engineers, operators and laboratory personnel on site who measure the results of treatment of potable and wastewater.

The California Environmental Laboratory Program (ELAP) is out of balance with the foundational legal mandate to '**Offer both** state accreditation and TNI accreditation' to the laboratories in California. ELAP lost reciprocity in 2014 to provide national accreditation for commercial laboratories located outside California. ELAP has done a great job in regaining a national standard from The NELAC Institute (TNI) which meets the needs of laboratories that have a national focus.

However, it is clear from the survey respondents that ELAP needs to refocus on strengthening the **California state accreditation standard**. California clean water professionals want to work with ELAP to strengthen the mission of the State Water Resources Control Board (SWRCB) "To preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations." The report concludes with proposed opportunities from industry groups and management professionals that can augment limited SWRCB resources for the creation of a quality management system that works for the people of California.

About the Author:

Amber Baylor has a B.A. in Biology with a minor in Chemistry from Lindsey Wilson College and a Master of Science in Environmental Science and Policy from Johns Hopkins University. Ms. Baylor spent 10 years managing a water quality laboratory for a water and wastewater utility servicing over 150,000 service connections. Ms. Baylor now serves as the Director of Environmental Compliance for a utility with a service area of 500,000 people. Ms. Baylor is also pursuing her Master of Public Administration with a focus on Public Policy at the University of Southern California.

[1] Clean Water Act Methods 40 CFR 136
[2] Safe Drinking Water Act Methods 40 CFR 141
[3] HSC § 100829

Introduction:

The white paper was produced from an analysis of a survey vetted through the Environmental Laboratory Technical Advisory Committee (ELTAC) and the California Water Environment Association (CWEA) Laboratory Committee and distributed in the summer-fall of 2017. The survey's main intent was to understand: laboratory demographics, professional challenges, budgetary constraints, and stakeholder involvement. The analytical results summarize questions based on five areas of analysis: Laboratory Geography, Fields of Testing, Quality Management Systems, Regulatory Exposure and Inclusion, & ELAP Audits.

Demographics were a key component to be able to identify the potential impact to directives from the SWRCB. For example, 83% of labs that responded in this survey that were not TNI certified only had an average of 7.5 full time employees (FTEs) while the 17% labs that were TNI certified had an average of 107 employees. There is a large discrepancy in the number of FTE that can absorb the additional administrative burdens that exist in the TNI standard. The difference in FTE can have drastic effect on the ability to implement any new standards as the utility or city may not have the resources to support additional FTEs.

Professional challenges related to normal workflow, special projects, allocating personnel to sample outside the laboratory, technical ability to fix autosamplers, and train personnel on the technical analysis are challenges that most laboratory managers face. There exists a professional imperative on the part of laboratory community and other management professionals who are charged with analysis and elucidation of water quality exceedances for the protection of public health and the environment. This professional imperative is built on the foundations of scientific inquiry whereby the truth-seeking dimension inherent in the scientific method overrides the personal cognitive implicit biases. The reliance on strong science has led to a professional trust and a regulator on site at most drinking water and waste water facilities in the State of California. However, this balance is upset with pushing the TNI standard to all regulated laboratories in California.

In addition to the potential loss of professional self-monitors, many in the laboratory community have not been provided with sufficient evidence that there was a problem state-wide with the data that was produced. Many laboratory professionals feel that ELAP, through their loss of reciprocity in 2014 needed to get its own house in order instead of changing the regulatory structure for the laboratories who had been producing good quality data historically. There is no wide spread evidence that public health protection has been compromised nor has the environment been degraded by the current system that laboratories use to produce good data. This system is based on methodologies published in the *Federal Register* which are folded into standard operating procedures that are cross-referenced by the *Standard Methods for the Examination of Water and Wastewater*. ELAP has historically served as the primary accrediting body-that audited laboratories, reviewed quality assurance manuals and quality control data and worked with laboratories on how to strengthen their analytical data as well as revoke certification if the audit did not provide evidence of quality data. It is unclear what served as the dissolution of the core function of ELAP audit protocol, but this survey sought to elucidate that answer.

Survey Questions and Participation Results:

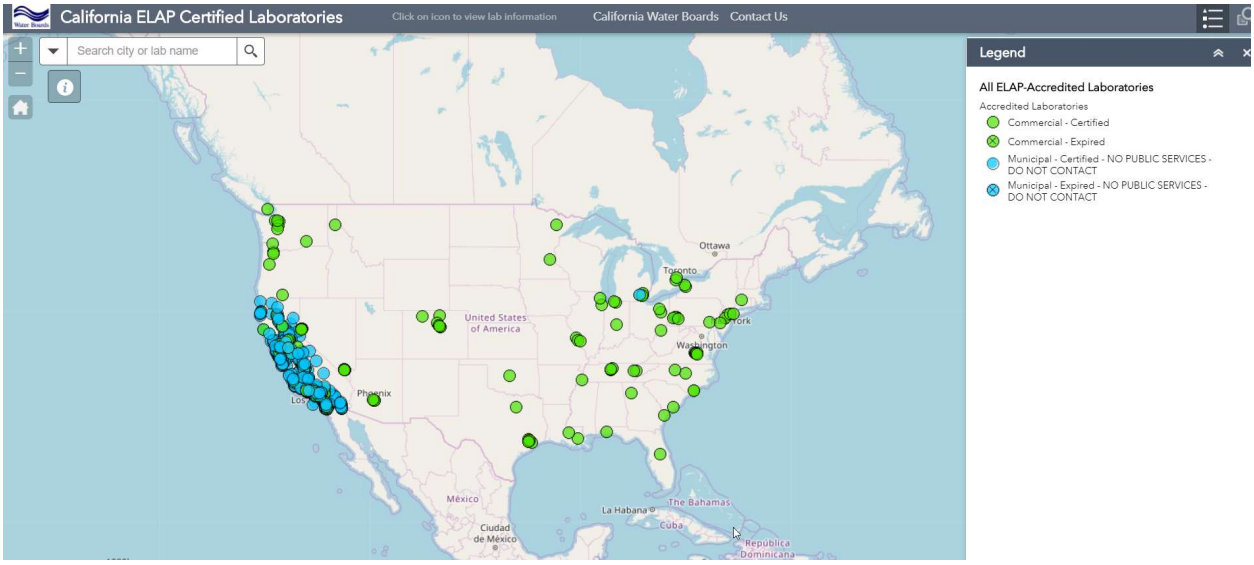
Survey questions were sent to the CWEA Laboratory Committee and one of the Southern California ELTAC representatives who were instrumental in helping aid the final design of the survey questions. The survey questions can be found in list form in Appendix A. The survey encompassed 23 questions and was built on earlier work that the CWEA lab community previously conducted in May and June 2016. There were 14 questions in the previous 2016 survey and all the questions were incorporated into the survey design of the 2017 survey. There were 46 respondents to the 2016 survey. For the 2017 survey, there were 655 contacts provided by ELAP Chief Christine Sotelo. The survey participants that were invited to participate are also in Appendix A. Of those contacts, 52 were not reachable via email. This gave the viable contact list of 603 people. Of the 129 respondents to the survey, 122 participants provided their contact information. This represents an approximately 21.4% participation rate in the survey.

Laboratory Geography:

Question 1 sought to understand the geographic extent of the laboratories. There were 109 respondents that were based in California while nine were from other states and two respondents were from Canada. There were 108 respondents that were based in California while 9 were from other states and 2 respondents were from Canada. LAP website provides an excellent GIS map of the laboratories that are certified through ELAP (Graphic 1). Graphic 1 illustrates that there are ELAP accredited laboratories across the United States and Canada, necessitating ELAP to pursue the TNI Standard to provide an avenue of accreditation.

QUESTION 1:

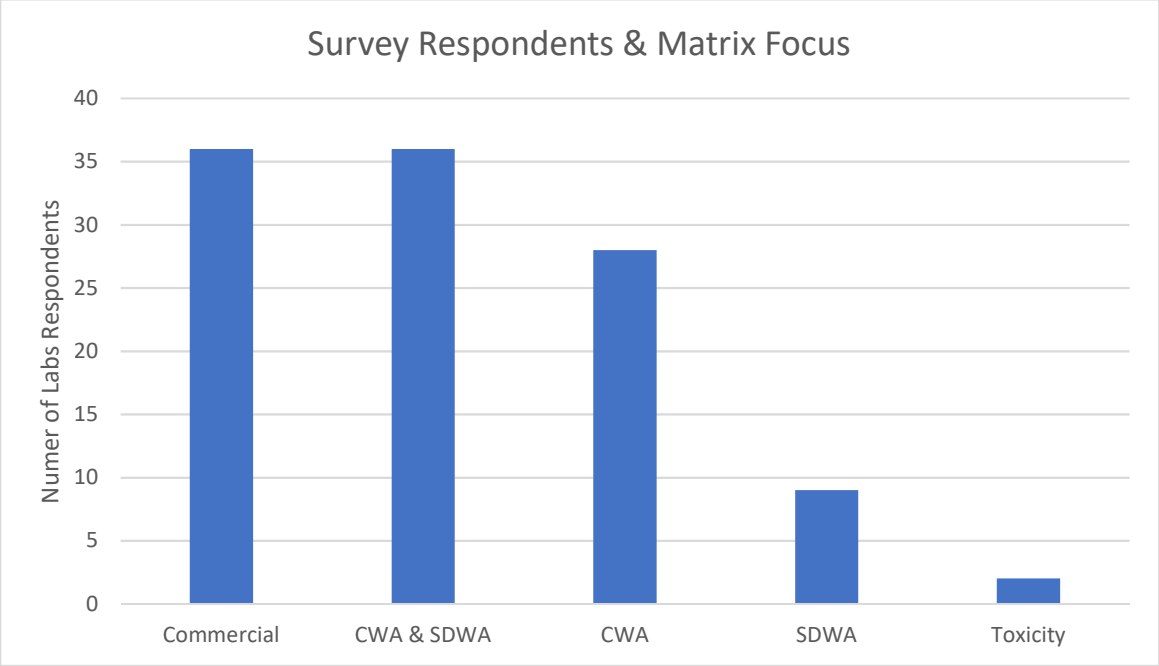
What is your name and the public or private lab you represent?



Graphic 1: ELAP GIS map[4]

4 https://waterboards.maps.arcgis.com/apps/webappviewer/index.html?id=bd0bd8b42b1944058244337bd2a4ebfa

One important component of this survey is to provide a baseline to the certified laboratories based on the proposed changing regulations. Chart 1 provides a breakdown of survey respondents who represent the commercial laboratories, laboratories who analyze samples related to both CWA & SDWA, those laboratories that only analyze samples related to the CWA, samples only related to the SDWA, and those laboratories that only analyze toxicity. Although toxicity is regulated through the CWA, the toxicity laboratories were shown to illustrate the small niche that these laboratories represent. It was unclear through the survey which commercial laboratories support either the CWA, SDWA or both which is why it was included in its own lumped total.



Graph 1: Matrix Analyses Related to Regulations

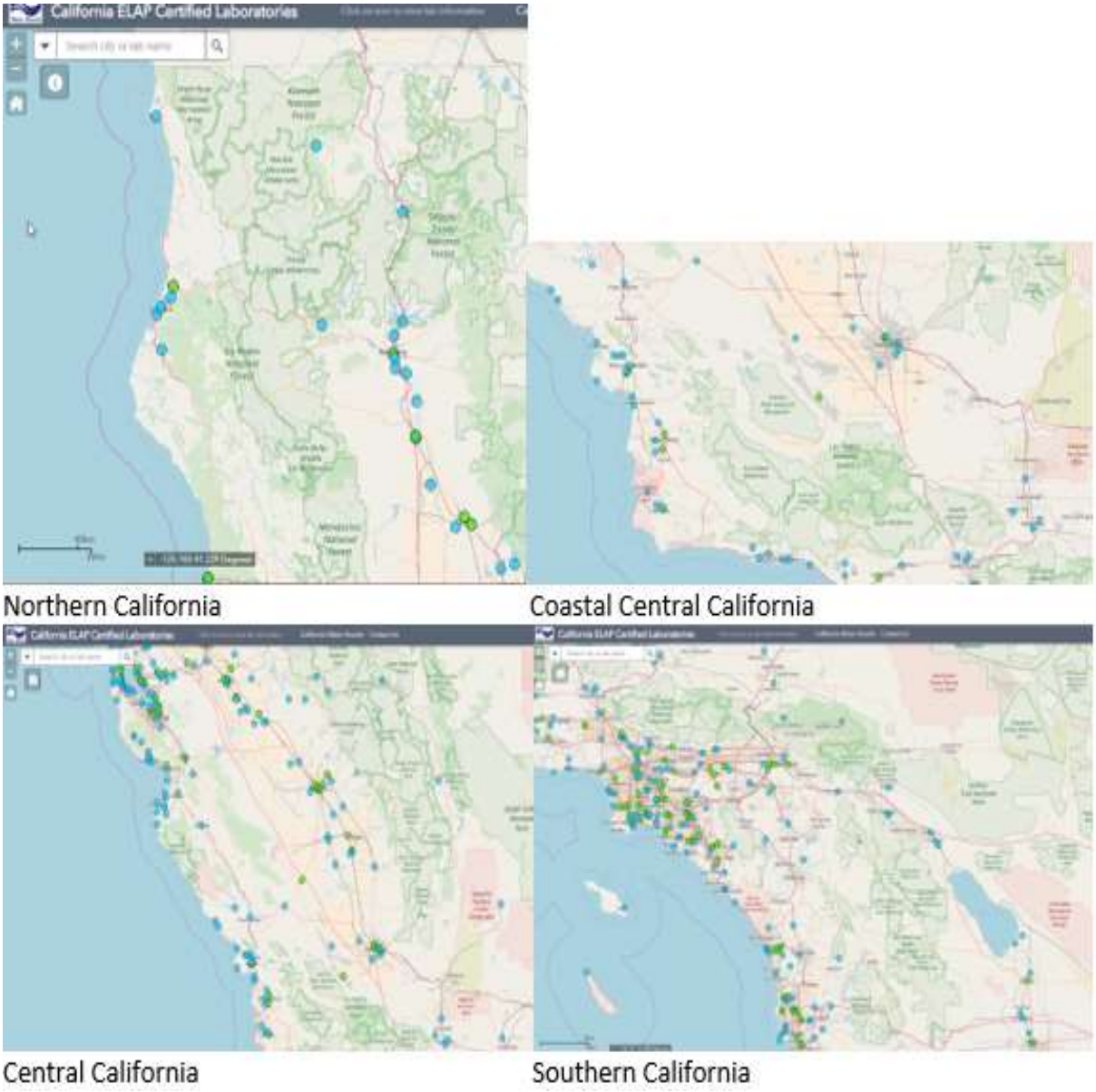
A historical analysis was performed from 2008 versus 2017 to understand the differences in the laboratories in California versus outside California. The number of laboratories in California in 2008 was 614, as compared to 554 in 2017. This represents a reduction of 9.8% in certified labs in California from 2008 through 2017. The comparison was further evaluated based on the number of California laboratories that are certified by ELAP. California based laboratories represent 84% of laboratories with ELAP accreditation in both the 2008 and the 2017-time frames despite the number of laboratories in other states entering into and exiting the ELAP system.

Table 1 provides the breakdown of number of laboratories in 2008 vs. 2017 in public and commercial laboratories. The data set in 2008 refined the level of detail as commercial or public labs while the 2017 survey did not provide that level of specificity based on the design of the survey.

2008			2017	
Commercial	Public	Other	Commercial	Public
268	317	32	242	310

Table 1: Commercial, Public, and Other Laboratories in California

The geographic range of the laboratories must also be considered for audit purposes as well as the possibility of those laboratories being shut down without a commercial laboratory within an acceptable range of distance, especially when you consider the short holding times requirements of many analyses. Graphic 2 provides a view of the distance between public and commercial laboratories. The green dots represent commercial laboratories and the blue dots are public laboratories. The largest distance between commercial laboratories and public laboratories was 111 miles, but through rough terrain that would be a 3 hour trip one-way making it problematic if the rural laboratory shuts down.



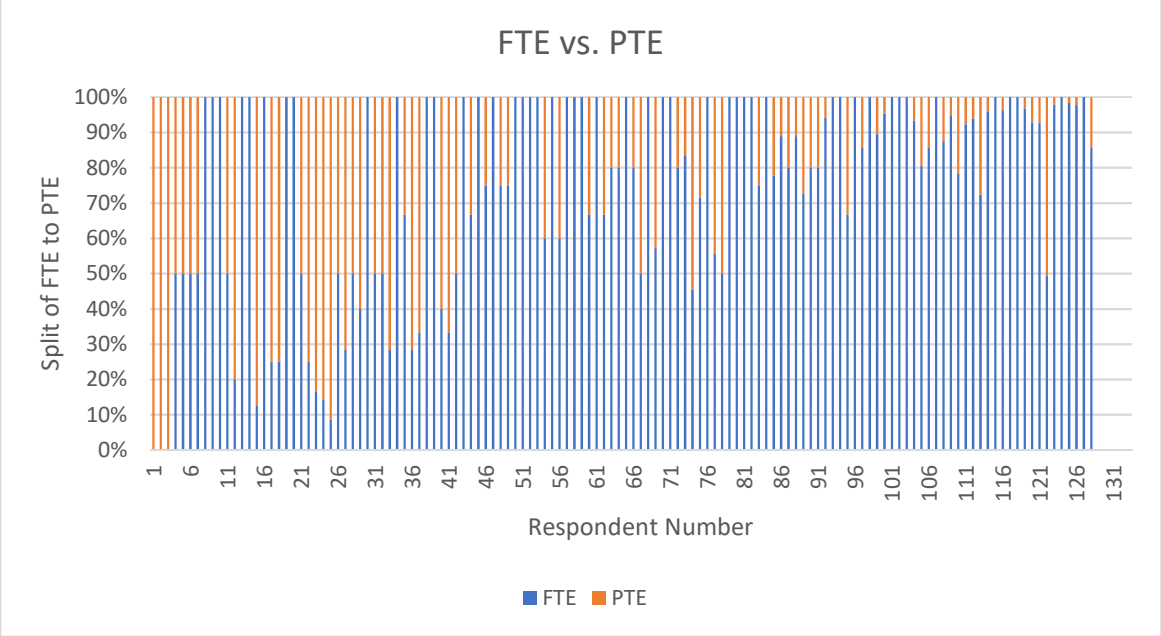
Graphic 2: Regional View of California Public and Private Laboratories

Laboratory Personnel, Resources, & Challenges:

In Questions 2 & 3 of the survey, the intent of these questions was to understand the demographics of laboratories based on staffing. The average number of full time employees identified in this survey was 23.76 with a range from 0 to 600 employees. If you were to remove the three laboratory respondents with 500-600 employees, the average of the respondents is 15.46 employees. The split between full-time employees (FTE) and part-time employees (PTE) can be seen in Graph 2. Respondent number is the number assigned to each individual laboratory that participated in the 2017 survey.

QUESTIONS 2 & 3:

How many people work full time and part time in your laboratory?

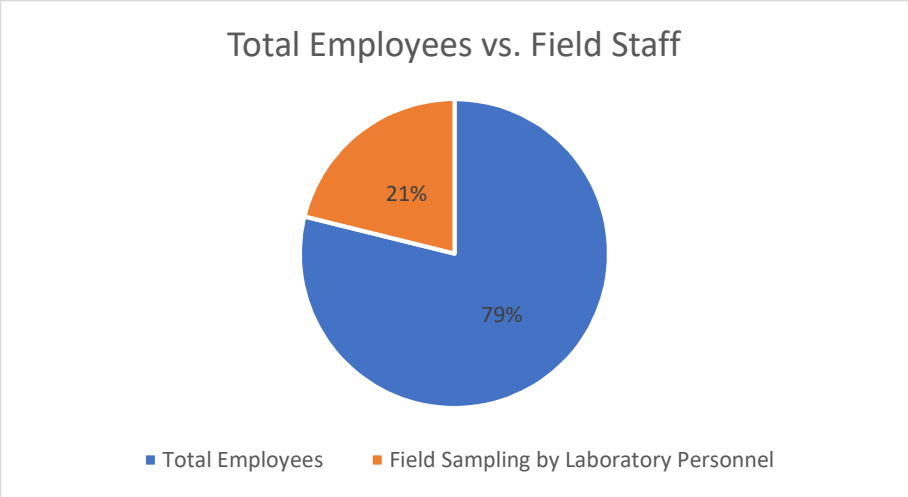


Graph 2: FTE vs. PTE

To understand the challenges management staff have with allocation of resources to meet utility, City, or commercial needs, questions 10 asked how many employees were engaged outside of the laboratory in field work. This is important to understand due to some of the rural laboratory locations where a large amount of field sampling is required (as can be seen in Graphic 3).

QUESTION 10:

How many people in your lab take samples in either your community water system, wastewater treatment plant, dairy, or other facilitv?

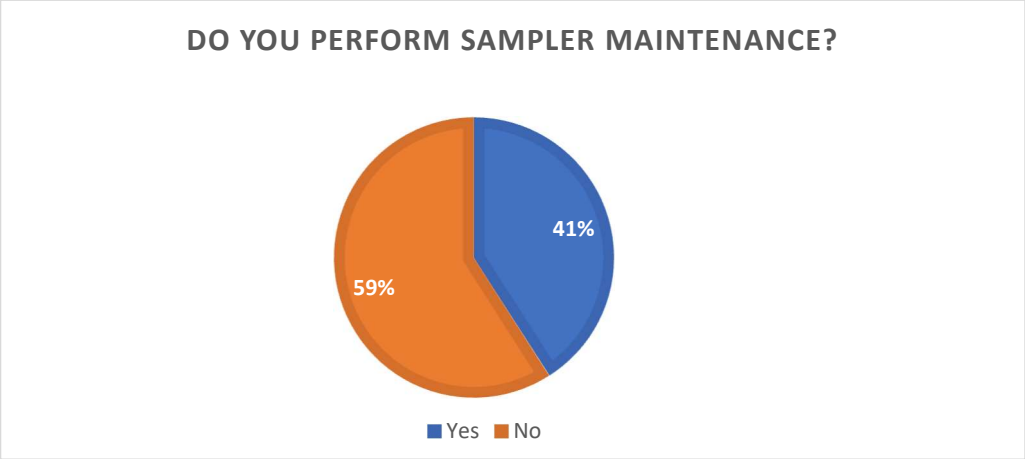


Graph 3: Total employees and field personnel required to obtain samples.

Building on an understanding of resource allocation, question 11 asked if staff perform sampler maintenance. Sampler maintenance is needed so that samples are representative of the matrix being analyzed. Results were generally equal with 59% of survey respondents stating that they do not perform sampler maintenance while 41% stated that they do perform sampler maintenance. This is important because many utility laboratories are multi-faceted and not only have staff charged with laboratory technician/analyst work, but those staff members could also be performing sampler maintenance to ensure representative samples as required by their respective permits. The result are seen in Graph 4.

QUESTION 11:

Do you perform sampler maintenance outside the laboratory?



Graph 4: Sampler Maintenance Review

Though it was not part of the survey, it should be noted that from verbal discussions with laboratory stakeholders, most publicly owned laboratories consist of laboratory personnel that also perform other duties in addition to field sampling and analysis. These other duties include, but are not limited to: sample and receiving, LIMS data entry/recordkeeping, report production and submittal to California Integrated

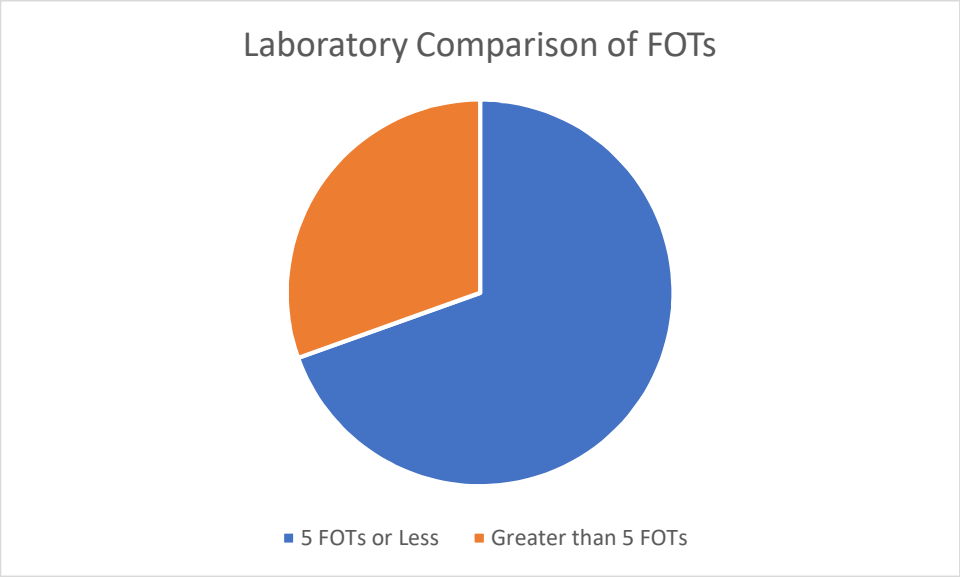
Water Quality System (CIWQS), Department of Drinking Water, purchasing, inventory, sample disposal and chemical hygiene plan implementation.

Fields of Testing Discussion:

QUESTION 4:

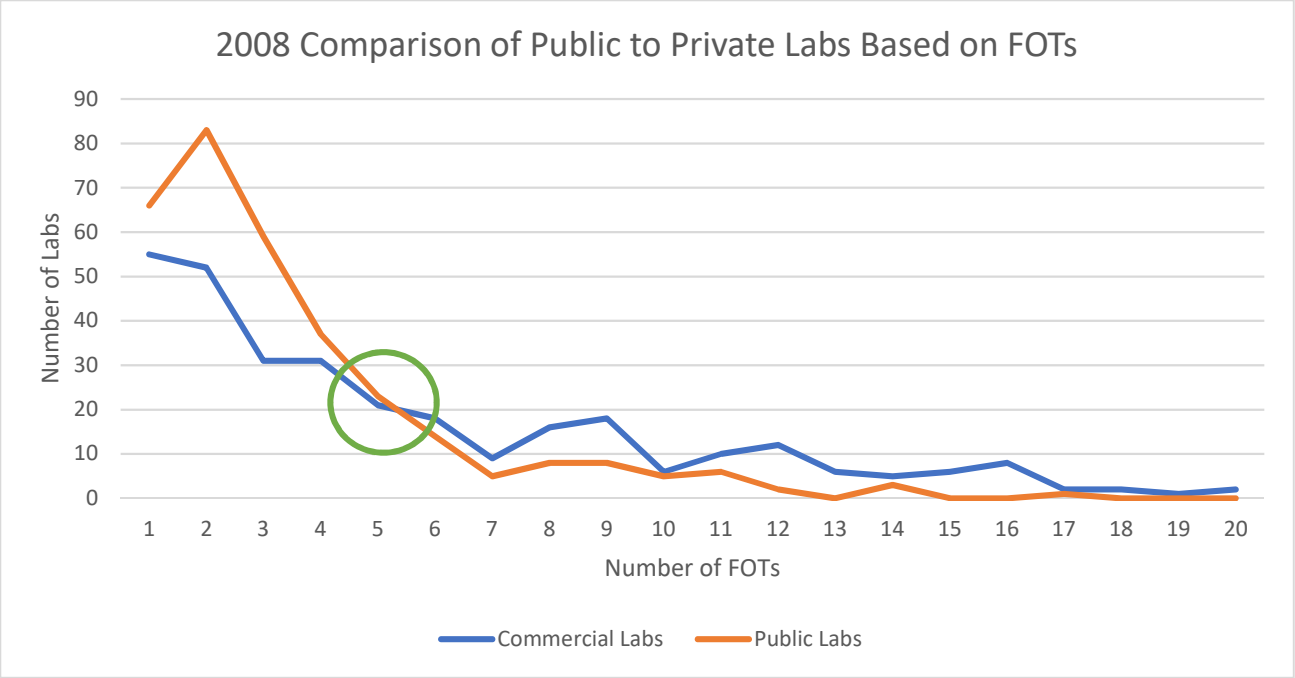
How many FOTs are you certified for?

Fields of testing (FOTs) are general categories of analytes that a laboratory analyzes based on the regulatory requirement, sophistication level of the analysts employed, and budget to support the additional testing from contract labs (most small laboratories are not full-service labs that can handle the regulatory testing for all their permit requirements). In Question 4, the survey sought to understand the number of fields of testing (FOTs) that each lab surveyed supported. Graph 5 illustrates that there were 89 laboratories with 5 FOTs or less, leaving 39 laboratories who can provide services for 6 or greater FOTs with an overall percentage of 70% of respondents certified for 5 FOTs or less.



Graph 5: Comparison of FOTs

A review of the historic relationship of FOTs to commercial and public labs was similar in 2008 where most labs specialize in 5 or less FOTs which can be seen in Graph 6. A total of 61% of commercial laboratories were certified for 5 FOTs or less while 81% of public laboratories were certified for 5 FOTs or less or a total of 71% when the commercial and public laboratories are combined. This is consistent with the survey results which had 70% of laboratories that were certified for 5 FOTs or less.

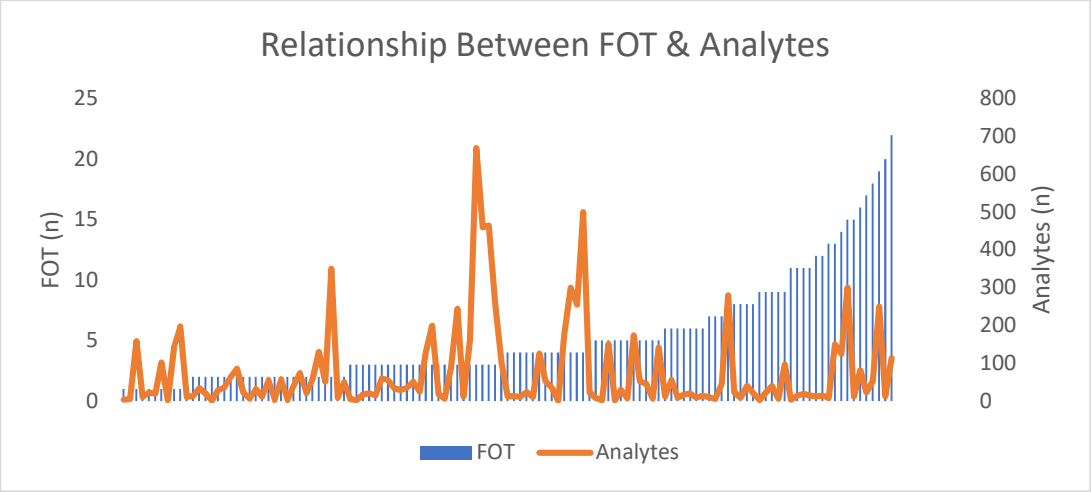


Graph 6: Regulated versus Commercial Laboratory FOTs

Question 5 sought to understand if there was a relationship between number of FOTs and the number of analytes to aid in future fee structure discussions. There was no relationship which provides further insight into the type of analyses that are being performed due to varying numbers of sub-group analytes within each FOTs. For example, some commercial laboratories may specialize in analytical chemistry, which would reduce the number of FOTs but increase the number of analytes. In addition, a commercial laboratory that specializes in toxicology could have a low FOT and a low number of analytes. The relationship can be seen in Graph 7.

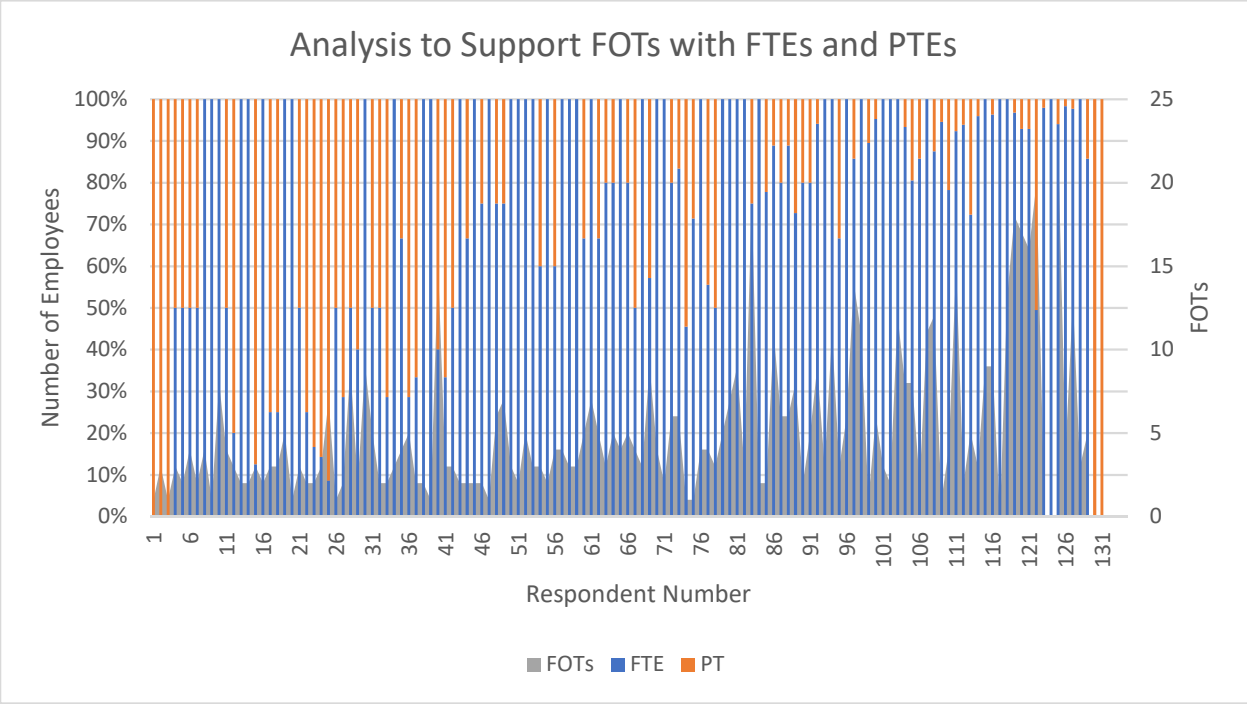
QUESTION 5:

Of those FOTs, how many analytes are you certified for?



Graph 7: FOTs and Analytes

To gain a better understanding of the FTE and PTE that would need to support a certain level of FOTs, the Graph 8 was created. There was no clear relationship between the increased number of FOTs and the higher concentration of FTE vs. PTE.



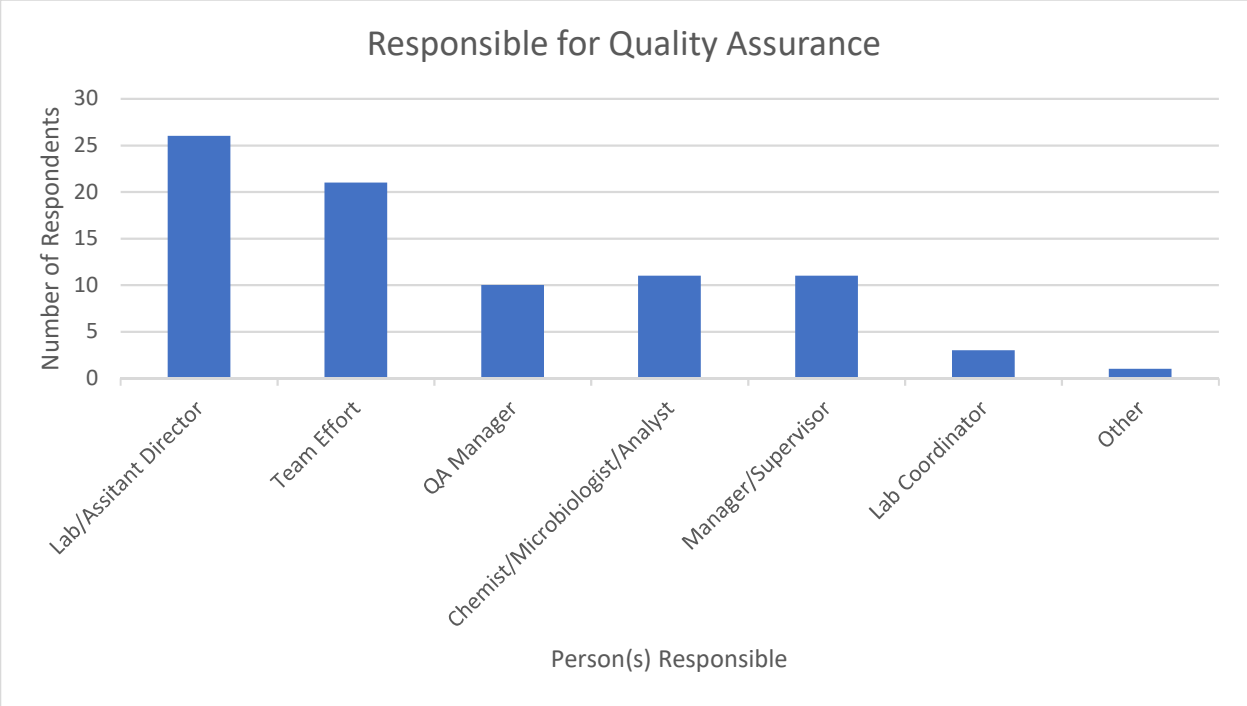
Graph 8: FTE and PTEs to support FOTs

Quality Management Systems:

Question 6 of the survey sought information on whom was responsible for quality assurance for the laboratory. The highest ranked person in the laboratory responsible for quality assurance was the Laboratory Director or Assistant Director. A 'Team Effort', although not provided as a response choice in the survey was the second highest ranked response in question 6. The fundamental production and review of data before it is reported to regulatory agencies or clients is a team effort that has involved and continues to involve all personnel in a laboratory. Graph 9 displays the results based on the survey

QUESTION 6:

What position in your laboratory maintains the quality assurance manual and quality control procedures?



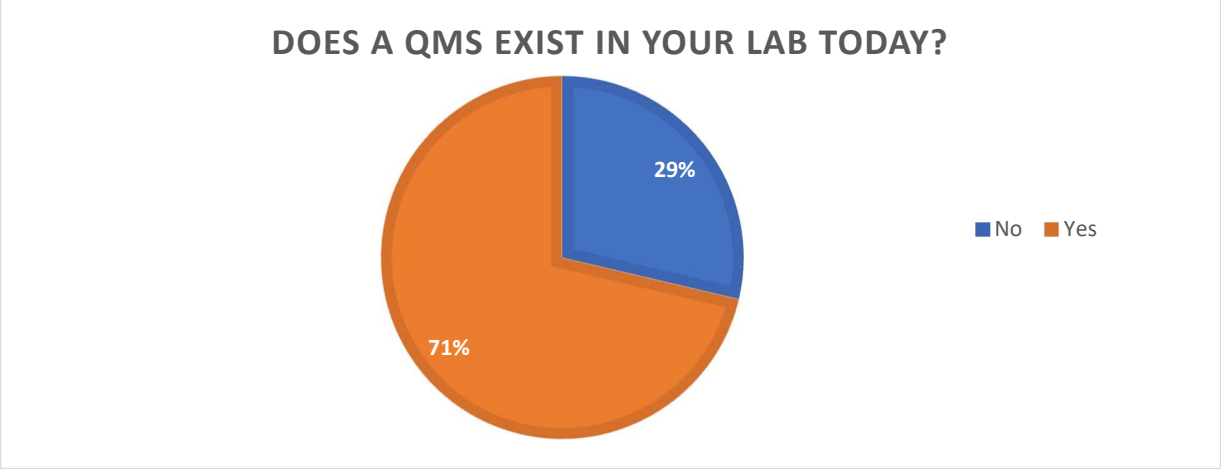
Graph 9: Quality Assurance Responsibilities

One question that has surfaced repeatedly is the fact that the current system that ELAP uses to audit laboratories does not include all elements of the quality management system being proposed in the new draft TNI regulations. Question 7 in the survey asked whether a QMS existed in the laboratories surveyed. Over 70% of respondents felt that a QMS did exist in their laboratory based on current regulations. However, many respondents who answered no o this question did so because they felt that the quality assurance program that they have in place would not meet the QMS requirements

QUESTION 7:

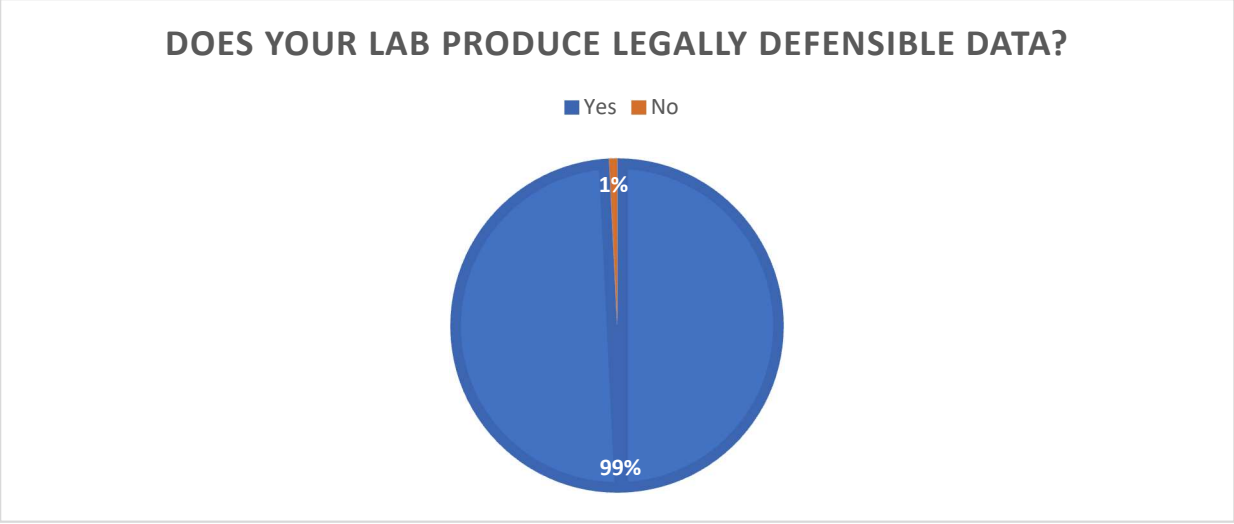
Do you have a quality management system? A quality management system (QMS) is a set of policies, processes and procedures required for planning and execution of laboratory data in your organization.

in TNI. On respondent explained that "The lab follows EPA, Standard Method and EPA Quality Assurance manual". Of the 38 laboratories that responded that they did not have a QMS, 5 of those laboratories were commercial while the other 33 were public laboratories. The results of the survey question can be seen in Graph 10.



Graph 10: QMS Existence

Although most laboratories stated that there was a QMS in place, the question of legally defensible data needed to be elucidated. An overwhelming 99% of laboratories thought that the data they produced would be legally defensible which means that even though 29% of the labs felt that they did not have a QMS in place (Graph 9), the data that they produced would be legally defensible by following the approved methods and California regulations, making it clear that a QMS has already existed in California laboratories. The results of the question can be seen in Graph 11.

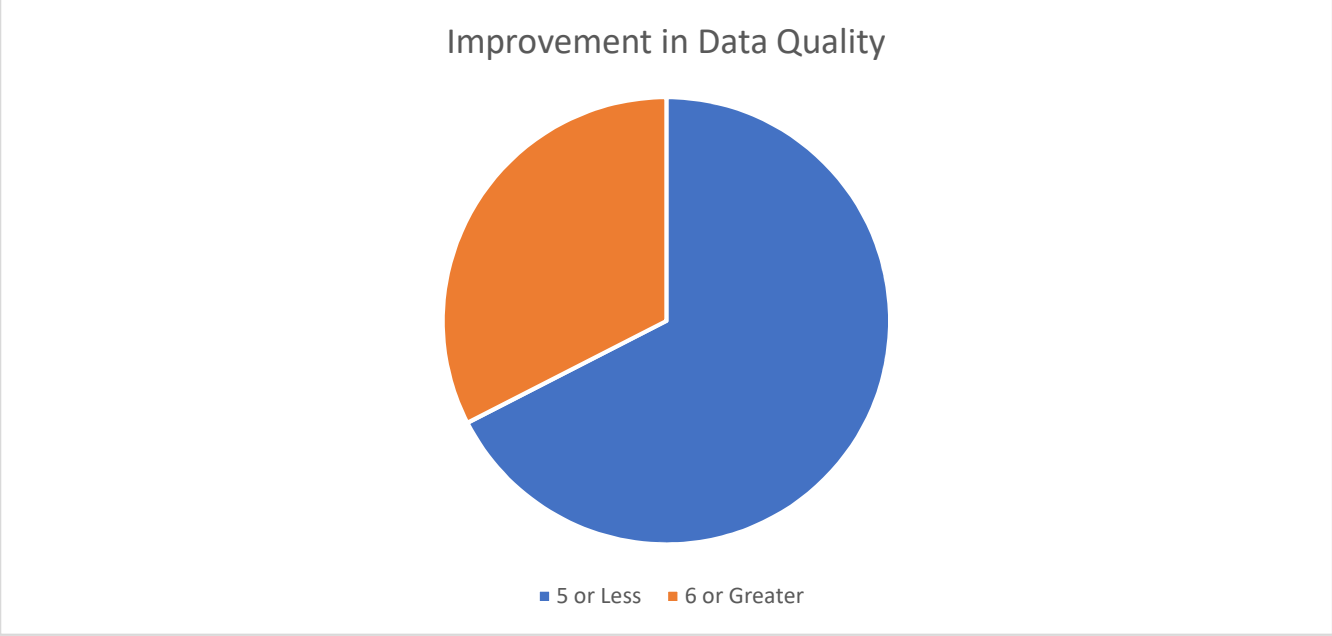


Graph 11: Legally Defensible Data

Question 19 sought to answer if the professional laboratory community thought that the proposed new draft regulations would improve data quality. Ranking responses on a scale from 1 to 10, with 1 being the worst and 10 the best), 62% of labs gave ELAP a score of 5 or less that the proposed regulations would improve data quality. This result can be seen in Graph 11. The professionals who know their site requirements the best and have the best understanding of data quality produced overwhelming believe that TNI will not improve data quality.

QUESTION 19:

On a scale from 1 to 10 with 10 being most satisfied, how satisfied are you that ELAP has drafted regulations that improve data quality?

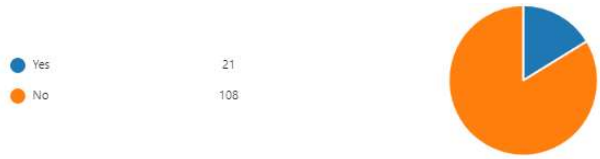


Graph 12: New Regulations and Improvement in Data Quality

Regulatory Exposure and Inclusion

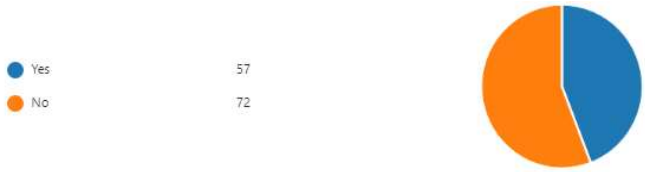
This section of questions sought to answer what level of understanding the laboratory community had regarding ELAP choosing TNI as the defacto standard and if the laboratory could include the TNI standards into the current levels of staff. Questions 12 through 15 provide a yes or no system that can be seen in Graphs 13 through 16

Graph 13: TNI Exposure from Question 12



Graph 14: TNI Certificate holders from Question 13

Graph 15: Regulatory Exposure from Question 14



Graph 16: TNI Implementation Ability from Question 15

QUESTION 12:

Do you know what the NELAC Institute (TNI) is?

QUESTION 13:

Do you hold a TNI certification currently?

QUESTION 14:

Do you know that the TNI standards have been included in the draft regulations by ELAP as of July 2017?

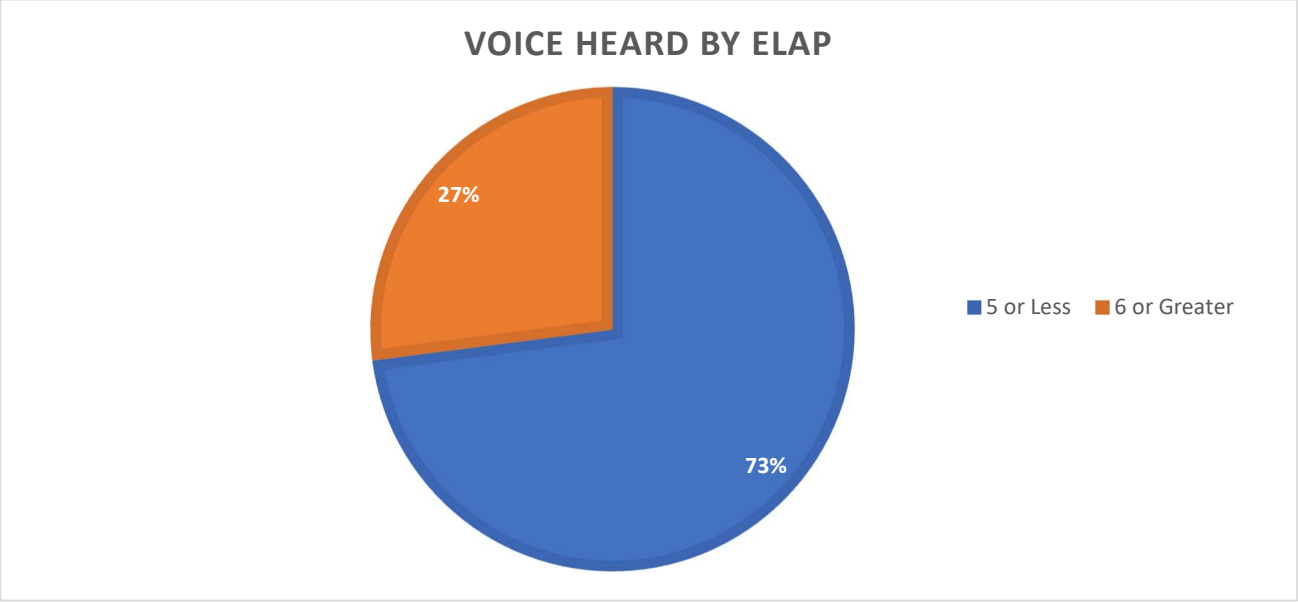
QUESTION 15:

Would you be able to implement the TNI standards with the staff you have now?

Although there are now stakeholder workshops to work with the laboratory community, many in the commercial and public laboratories have commented that ELAP did not include them in the process but instead chose the TNI standard and is now attempting to make all laboratories fit into the chosen standard. Question 20 sought to answer that question. Ranking responses on a scale from 1 to 10, with 1 being the worst and 10 the best, overwhelmingly 73% of labs gave ELAP a score of 5 or less that the laboratory community has not been heard in the drafting of the regulations. A high percentage of respondents believe they have not been heard. This is illustrated in Graph 17.

QUESTION 20:

On a scale from 1 to 10 with 10 being most satisfied, do you feel that your voice has been adequately heard and ELAP is responsive to your input?



Graph 17: Voice Heard By ELAP

Question 22 sought to understand if the respondents were planning on budgeting additional funding in 2018 to meet the TNI implementation, 85% of respondents said that they had not budgeted any additional funding. Many respondents were unclear as to the fee structure that ELAP is working on and refrained to commit any money for TNI accreditation. This is insightful especially as laboratories consider if ELAP would not be the accrediting agency responsible for implementation unless a workable solution could be proposing. The unclear situation makes budgeting problematic.

QUESTION 22

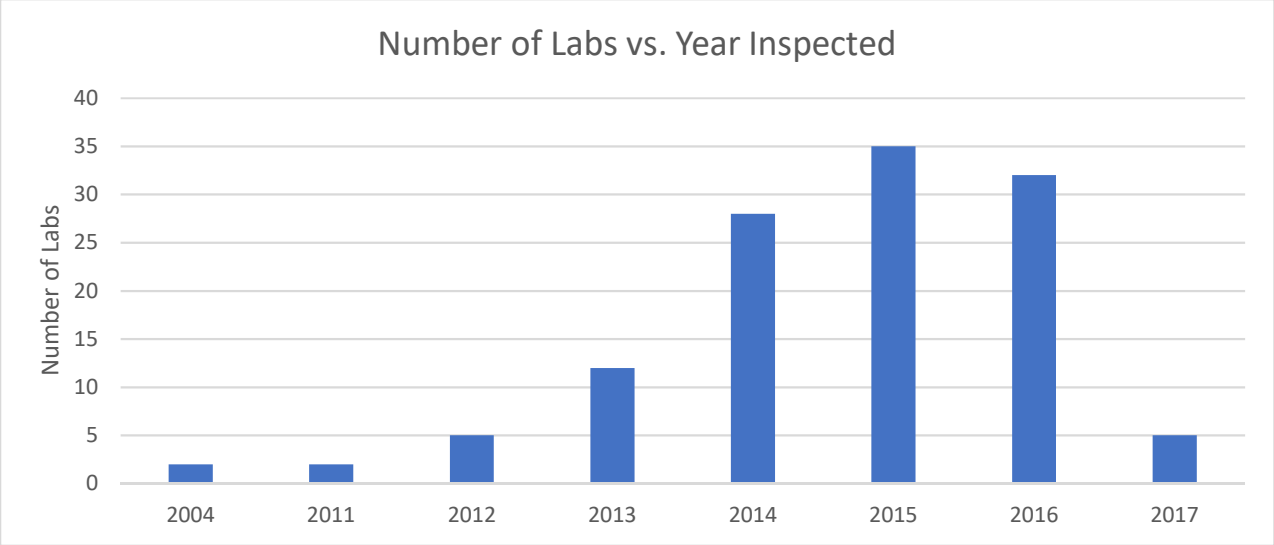
Have you budgeted any extra for 2018 to meet the new regulations and if so, how much budget have you allocated to meet the new regulations?

ELAP Audits

To further understand where ELAP is with regards to their audits, question 18 asked when the last physical audit occurred. Graph 18 provides an overview of that question which grouped labs on last audit year. The survey results represent approximately 20% of certified labs and if this data set is representative of the certified laboratories then that would mean that roughly 25 laboratories were audited by ELAP in 2017. Ability to keep up the auditing of laboratories is problematic but ELAP has begun utilizing outside 3rd party assessors to fill in the gaps where resources are not available which is positive.

QUESTION 18:

When was the last time your lab was physically audited by ELAP?



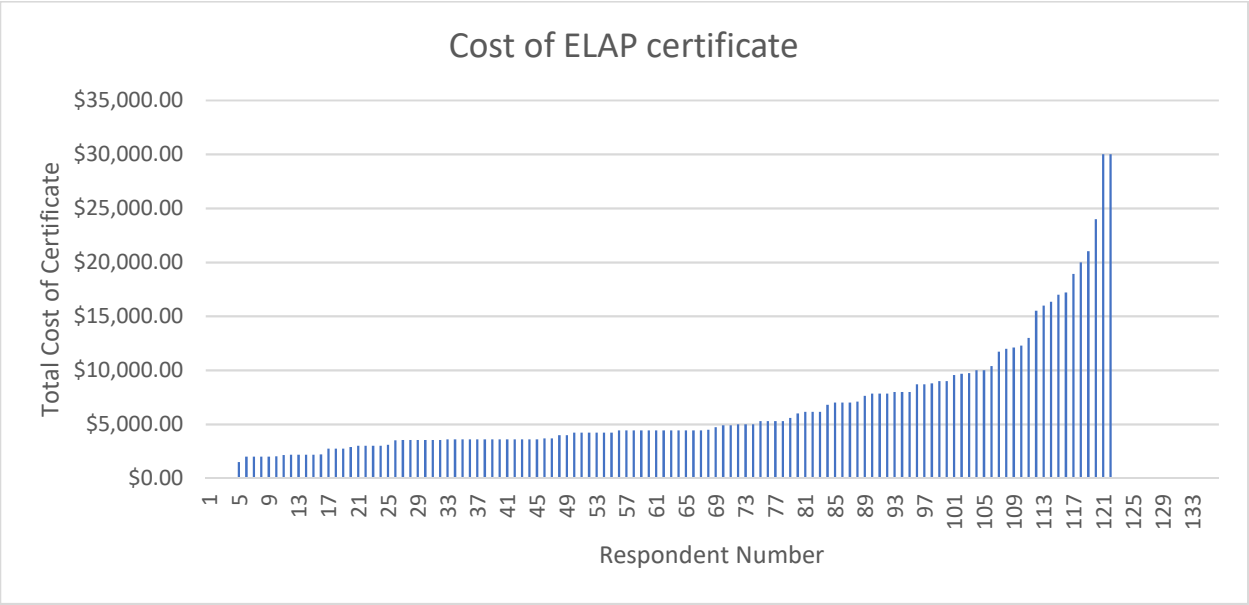
Graph 18: ELAP Audits per Year

Question 16 asked respondents the cost of their ELAP certification fees which totaled to approximately $780,000. The total revenues in 2016 there was a projected amount of $3.5M in revenues[5]. The respondents' totaled fees were approximately 20% of the total revenues of ELAP and could be extrapolated to be a good barometer for the overall make-up of labs serviced by ELAP. The distribution of fees can be seen in Graph 19.

QUESTION 16:

What is the cost of ELAP certification now?

[5] https://www.waterboards.ca.gov/board_info/agendas/2016/sept/092016_9_att1.pdf



Graph 19: ELAP Fee Distribution

Future of ELAP

The final question (#23) in the survey was to understand the current and future impact of changes to California Water Code.. The updates to California Water Code 13176(2) include provisions that exempt lab accreditation for field tests for color, odor, pH, temperature, dissolved oxygen, conductivity, and disinfectant residual. More than 40 laboratories said that they would consider dropping their accreditation based on this.(Graph 20). That would result in a revenue loss to ELAP of between $250,000 to $500,000 (assuming a lab fee between $6250 and $12,500). Due to the administrative burden imposed by TNI if adopted by SWRCB, ELAP regulations will greatly affect small laboratories emphasizing the need for a California standard that works in California. What is the need for ELAP if there is no requirement for ELAP certification and TNI third party assessors can be utilized for audit purposes?

QUESTION 23:

Based on the update to CWC Section 13176 (2) which exempts field tests for color, odor, pH, temperature, dissolved oxygen, conductivity, and disinfectant residual, would you keep your current certification through ELAP?

Graph 20: Adoption of TNI and CWC Impact to Accreditation

Concluding Remarks

Many in the laboratory community are beginning to question the need for ELAP if ELAP or the laboratories must hire third party auditors to perform TNI audits. Therefore, what is the role that ELAP should play in the arbitrator of quality data? There is no valid reason to support two accrediting bodies when one would suffice. The laboratory community wants to work with ELAP to craft regulations that can be carried out in an equitable and workable format without compromising data quality, but the current proposed new regulation is unworkable.

The vision of ELAP is "Through effective program implementation and continuous improvement of ELAP, California will produce the highest quality scientific data as a foundation for its environmental and public health programs and decisions." The laboratory community has and will continue to share this commitment to high quality scientific data. There are many in the laboratory community who felt that their voices were not heard and continue not to be heard. The comments related to their voice being heard can be found in Appendix B. The Appendix B comments provide evidence that the laboratory community is upset about the process and many of the comments suggest that the laboratories will be dropping accreditation through ELAP. The respondents in the survey represent approximately 2300 employees. If the respondents were ~20% of the laboratories and half of those laboratories gave up ELAP certification, this could result in a loss of 500-1000 regulator that the SWRCB relies on to carry out its mission.

There are industry groups that represent the regulated laboratory communities in Northern, Central, and Southern California that can help ELAP craft regulations that are in alignment with the quality management systems in the CWA & SDWA. It appears that ELAP is out of balance, and regulators must work with stakeholder communities to provide a State accreditation standard that works for California.

Appendix A:

Survey Questions:

1. What is your name and the public or private lab you represent?
2. How many people work full time in your laboratory?
3. How many people part time in your laboratory? (such as operators, maintenance, or engineering staff)
4. How many FOTs are you certified for?
5. Of those FOTs, how many analytes are you certified for?
6. What position in your laboratory maintains the quality assurance manual and quality control procedures?
7. Do you have a quality management system? A quality management system (QMS) is a set of policies, processes and procedures required for planning and execution of laboratory data in your organization.
8. Please explain your answer in the previous question.
9. Please state what type of samples are analyzed by your laboratory? Please choose the number below that best suits your industry.
10. How many people in your lab take samples in either your community water system, wastewater treatment plant, dairy, or other facility?
11. Do you perform sampler maintenance outside the laboratory?
12. Do you know what the NELAC Institute (TNI) is?
13. Do you hold a TNI certification currently?
14. Do you know that the TNI standards have been included in the draft regulations by ELAP as of July 2017?
15. Would you be able to implement the TNI standards with the staff you have now?
16. What is the cost of ELAP certification now?
17. Do you believe that the data your lab produces is legally defensible?
18. When was the last time your lab was physically audited by ELAP?
19. On a scale from 1 to 10 with 10 being most satisfied, how satisfied are you that ELAP has drafted regulations that improve data quality?
20. On a scale from 1 to 10 with 10 being most satisfied, do you feel that your voice has been adequately heard and ELAP is responsive to your input?
21. Please provide any additional comments or questions you would like ELAP to address.
22. Have you budgeted any extra for 2018 to meet the new regulations and if so, how much budget have you allocated to meet the new regulations?
23. Based on the update to CWC Section 13176 (2) which exempts field tests for color, odor, pH, temperature, dissolved oxygen, conductivity, and disinfectant residual, would you keep your current certification through ELAP?

Laboratories that were invited to participate in the survey. The laboratories included in this survey as of current laboratory list in 2017 as received from Christine Sotelo.

Laboratory Name	City	State
A & L Western Laboratories	Moss	CA
A & R Laboratories	Riverside	CA
A & R Laboratories, Inc.	Ontario	CA
A & R Laboratories, Inc.	Ontario	CA
Abalone Coast Analytical, Inc.	San Luis Obispo	CA
Acculabs, Inc.	Arcadia	CA
Accurate Analytical Testing, LLC	Romulus	MI
Accutest Laboratories	Dayton	NJ
ACM Engineering & Environmental Services, Inc.	South Bend	IN
ACZ Laboratories, Inc.	Steamboat Springs	CO
Advanced Technology Laboratories	Signal Hill	CA
AEMTEK, Inc	Fremont	CA
Aerospace Fuels Laboratory	Vandenberg AFB	CA
AES - Redondo Beach	Redondo Beach	CA
AES Alamitos, LLC	Long Beach	CA
AES Huntington Beach LLC	Huntington Beach	CA
AESL Environmental Laboratory	Tempe	AZ
Agua De Lejos Water Treatment Plant Laboratory	Upland	CA
Alameda County Public Health Laboratory	Oakland	CA
Alameda County Water District Water Quality Laboratory	Fremont	CA
Alpha Analytical Laboratories, Inc.	Elk Grove	CA
Alpha Analytical Laboratories, Inc.	Ukiah	CA
Alpha Analytical Laboratories, Inc.	Dublin	CA
Alpha Analytical, Inc.	Sparks	NV
ALS Canada Ltd	Burlington, Ontario	CN
ALS Environmental - Fort Collins	Fort Collins	CO
ALS Environmental - Houston HRMS	Houston	TX
ALS Environmental, Kelso	Kelso	WA
ALS Group USA, Corp.	Houston	TX
Alvarado Wastewater Chemistry Lab.	La Mesa	CA
America Science Team of Richmond, Inc. dba AmeriSci Richmond	Midlothian	VA
American Analytics Inc.	Chatsworth	CA
American Analytics, Inc.	Chatsworth	CA
American Analytics, Inc.	Chatsworth	CA
American Environmental Testing Laboratory, Inc.	Burbank	CA
American Radiation Services, LLC (ARS International, LLC)	Port Allen	LA
American Scientific Laboratories, LLC	Los Angeles	CA
American Water Central Laboratory	Belleville	IL
AmeriSci Los Angeles	Carson	CA

Anachem Laboratories, LLC	El Segundo	CA
Analytical Chemical Labs, Inc.	San Diego	CA
Analytical Labs San Francisco, Inc.	San Francisco	CA
Analytical Resources, Inc. (ARI)	Tukwila	WA
Anresco Laboratories	San Francisco	CA
Antelope Valley-East Kern Water Agency	Palmdale	CA
Apex Laboratories	Tigard	OR
Apex Laboratories, LLC	Tigard	OR
APPL, Inc. (Agriculture & Priority Pollutants Laboratories, Inc.)	Clovis	CA
Applied Industrial Microbiology, Inc.	Vista	CA
Applied Microbiological Services (AMS)	Long Beach	CA
AQ Environmental Laboratories, LLC	Signal Hill	CA
Aqualab	Twain Harte	CA
Aqua-Science	Davis	CA
Aquatic Bioassay & Consulting Laboratories, Inc.	Ventura	CA
Aquatic Testing Laboratories	Ventura	CA
Aquatic Toxicology Laboratory, Aquatic Health Program	Davis	CA
Arrowhead Spring Water	Livermore	CA
Asbestech	Carmichael	CA
Asbestos TEM Laboratories, Inc	Berkeley	CA
ASSET Laboratories	Cerritos	CA
ASSET Laboratories	Las Vegas	NV
ATEL, LLC	Chino Hills	CA
ATS Analytical Laboratories	Brawley	CA
Avalon Wastewater Treatment Facility	Avalon	CA
Babcock Laboratories, Inc.	Riverside	CA
Baseline Analytical Services	Huntington Beach	CA
Basic Laboratory, Inc	Chico	CA
Basic Laboratory, Inc.	Redding	CA
BC Laboratories, Inc.	Bakersfield	CA
Big Bear Area Regional Wastewater Agency	Big Bear City	CA
Bioscreen Testing Services, Inc.	Torrance	CA
Bottling Group, LLC	Hayward	CA
Brelje and Race Laboratories, Inc.	Santa Rosa	CA
BSK Associates	Fresno	CA
BSK Associates	Rancho Cordova	CA
BSK Associates - San Bernardino	San Bernardino	CA
Burbank Water and Power	Burbank	CA
C & E Laboratories, Inc. (Chemical & Environmental Laboratories, Inc.)	Cerritos	CA
C & H Sugar Company	Crockett	CA
CA Dept.of Food and Agriculture, Center for Analytical Chemistry	Sacramento	CA
Calenergy Operating Corporation	Calipatria	CA

California American Water - Carmel Valley Ranch WW Laboratory	Carmel	CA
California American Water - Monterey Laboratory	Monterey	CA
California Dept of Fish & Wildlife, OSPR Laboratory Program IOLP)	Rancho Cordova	CA
California Laboratory Services	Rancho Cordova	CA
California Men's Colony Wastewater Treatment Plant	San Luis Obispo	CA
California Men's Colony Water Treatment Plant	San Luis Obispo	CA
California Water Service Company Laboratory	San Jose	CA
Caltech Environmental Laboratories, Inc.	Paramount	CA
Caltest Analytical Laboratory	Napa	CA
Camarillo Sanitary District	Camarillo	CA
Cambria Community Services District	Cambria	CA
Camrosa Water District Laboratory	Camarillo	CA
Camrosa Water Reclamation Facility Laboratory	Camarillo	CA
Capco Analytical Services	Ventura	CA
Cape Fear Analytical, LLC	Wilmington	NC
Carlsbad Desalination Plant Laboratory	Carlsbad	CA
Carmel Area Wastewater District	Carmel	CA
Carpinteria Sanitary District	Carpinteria	CA
Casitas Municipal Water District	Oak View	CA
Castaic Lake Water Agency	Santa Clarita	CA
Castle Analytical Laboratory	Atwater	CA
CEI Labs, Inc.	Cary	NC
Cel Analytical, Inc.	San Francisco	CA
Central Coast Water Authority	Shandon	CA
Central Contra Costa Sanitary District	Martinez	CA
Central Marin Sanitation Agency	San Rafael	CA
Cerco Analytical, Inc.	Concord	CA
Ceres Analytical Laboratory, Inc.	El Dorado Hills	CA
Certified Laboratories	Turlock	CA
CH2M Hill OMI -- Gilroy / Morgan Hill Laboratory (SCRWA)	Gilroy	CA
Chem Pro Laboratory, Inc.	Gardena	CA
Chemical Waste Management, Inc.	Kettleman City	CA
Chevron Bioassay Laboratory	Richmond	CA
Chevron Environmental Laboratory	Richmond	CA
ChromaDex Analytics, Inc.	Boulder	CO
City of American Canyon	American Canyon	CA
City of Anaheim Water Quality Laboratory	Anaheim	CA
City of Antioch Water Treatment Plant	Antioch	CA
City of Arcata Water Quality Laboratory	Arcata	CA
City of Atwater Wastewater Treatment Facility Laboratory	Atwater	CA
City of Auburn Wastewater Treatment Plant Laboratory - OMI	Auburn	CA
City of Bakersfield Wastewater Treatment Plant 2	Bakersfield	CA
City of Bakersfield - Wastewater Treatment Plant 3	Bakersfield	CA

City of Banning WWTP Laboratory	Banning	CA
City of Benicia Wastewater Laboratory	Benicia	CA
City of Benicia Water Laboratory	Benicia	CA
City of Brawley Wastewater Laboratory	Brawley	CA
City of Brentwood Water Quality Laboratory	Brentwood	CA
City of Burbank Water Reclamation Plant Laboratory	Burbank	CA
City of Burlingame Waste Water Facility - Veolia	Burlingame	CA
City of Calexico Water Pollution Control Plant	Calexico	CA
City of Calistoga Dunaweal WWTP	Calistoga	CA
City of Chico Water Pollution Control Plant - Wastewater Laboratory	Chico	CA
City of Corning Wastewater Treatment Plant	Corning	CA
City of Davis Wastewater Treatment Plant	Davis	CA
City of El Centro Wastewater Treatment Plant	El Centro	CA
City of Escondido Water Quality Laboratory	Escondido	CA
City of Eureka Water & Wastewater Laboratory	Eureka	CA
City of Fairfield, Water Treatment Plant Laboratory	Fairfield	CA
City of Fortuna Wastewater Treatment Plant	Fortuna	CA
City of Fresno Wastewater Management Division Laboratory	Fresno	CA
City of Grass Valley - Water Quality Laboratory	Grass Valley	CA
City of Hanford Wastewater Treatment Plant	Hanford	CA
City of Hayward WPCF Laboratory - PO No. 1600622-00	Hayward	CA
City of Healdsburg Water Reclamation Facility	Healdsburg	CA
City of Hollister Treatment Plant	Hollister	CA
City of Livermore Water Reclamation Plant	Livermore	CA
City of Lodi White Slough WPCF Laboratory	Lodi	CA
City of Lompoc Water Treatment Plant Laboratory	Lompoc	CA
City of Los Angeles - Standards Testing Laboratory	Los Angeles	CA
City of Los Angeles Dept of Water & Power Environmental Laboratory	Los Angeles	CA
City of Los Angeles Dept of Water & Power Environmental Laboratory	Los Angeles	CA
City of Madera WWTP Laboratory	Madera	CA
City of Manteca - WQCF Laboratory	Manteca	CA
City of Martinez Water Treatment Plant	Martinez	CA
City of Merced Water Quality Laboratory	Merced	CA
City of Millbrae Water Pollution Control	Millbrae	CA
City of Modesto Water Quality Control Laboratory	Modesto	CA
City of Mt. Shasta Wastewater Laboratory	Mt. Shasta	CA
City of Oceanside Water Utilities Department Laboratory	Oceanside	CA
City of Orange	Orange	CA
City of Oxnard Laboratory Services	Oxnard	CA
City of Pacifica, Calera Creek Water Recycling Plant	Pacifica	CA

City of Pasadena Water Quality Laboratory	Pasadena	CA
City of Paso Robles Water Quality Laboratory	Paso Robles	CA
City of Petaluma Water Quality Laboratory	Petaluma	CA
City of Pismo Beach Water Quality Laboratory	Pismo Beach	CA
City of Placerville Water Reclamation Facility	Placerville	CA
City of Porterville Laboratory	Porterville	CA
City of Red Bluff Water Reclamation Plant Laboratory	Red Bluff	CA
City of Redding Clear Creek Wastewater Treatment Facility Lab	Anderson	CA
City of Redding Stillwater Wastewater Treatment Plant Laboratory	Anderson	CA
City of Redlands Joint Utilities Laboratory	Redlands	CA
City of Reedley Wastewater Treatment Plant Laboratory	Reedley	CA
City of Riverside - Laboratory Services	Riverside	CA
City of Roseville Dry Creek Water Quality Laboratory	Roseville	CA
City of Roseville Pleasant Grove Water Quality Laboratory	Roseville	CA
City of Sacramento, Water Quality Laboratory	Sacramento	CA
City of San Buenaventura Laboratory	Ventura	CA
City of San Diego - Marine Microbiology Laboratory	San Diego	CA
City of San Diego Public Utilities Dept. Toxicology Laboratory	San Diego	CA
City of San Diego Water Quality Laboratory	La Mesa	CA
City of San Diego's Industrial Waste Laboratory	La Mesa	CA
City of San Luis Obispo Water Quality Laboratory	San Luis Obispo	CA
City of San Mateo Wastewater Treatment Plant	San Mateo	CA
City of Santa Cruz Water Quality Laboratory	Santa Cruz	CA
City of Santa Cruz WWTF Laboratory	Santa Cruz	CA
City of Santa Maria Wastewater Treatment Plant Laboratory	Santa Maria	CA
City of Santa Monica/Water Quality Laboratory	Los Angeles	CA
City of Santa Rosa Laguna Environmental Laboratory	Santa Rosa	CA
City of Scotts Valley Wastewater Reclamation Facility Lab	Scotts Valley	CA
City of Shasta Lake Wastewater Treatment Facility	Shasta Lake	CA
City of Simi Valley Water Quality Control Laboratory	Simi Valley	CA
City of South San Francisco-San Bruno	South San Francisco	CA
City of Stockton, Municipal Utilities Department	Stockton	CA
City of Stockton, Municipal Utilities Department (MUD), Delta Water Treatment Plant Lab	Lodi	CA
City of Sunnyvale Environmental Laboratory	Sunnyvale	CA
City of Tracy Utilities Department Laboratory	Tracy	CA
City of Turlock	Turlock	CA
City of Vacaville Water Quality Laboratory	Elmira	CA
City of Vallejo Water Department Laboratory	Vallejo	CA
City of Watsonville Utilities Department Laboratory	Watsonville	CA
City of Woodland Wastewater Operations Laboratory	Woodland	CA
Clarkson Laboratory and Supply, Inc.	Chula Vista	CA
Clean Earth Environmental Testing Laboratory	Santa Monica	CA

Clean Harbors Environmental Services, Inc.	Buttonwillow	CA
Clean Harbors Environmental Services, Inc.	Los Angeles	CA
Clean Harbors San Jose, LLC	San Jose	CA
Clinical Laboratory of San Bernardino, Inc.	Grand Terrace	CA
Clinical Laboratory of San Bernardino, Inc.	Lompoc	CA
Clovis Sewage Treatment and Water Reuse Facility	Clovis	CA
CM Analytical, Inc.	Gilroy	CA
Coachella Sanitary District	Coachella	CA
Coachella Valley Water District Laboratory	Coachella	CA
Continental Water Laboratory	Sacramento	CA
Contra Costa Water District Laboratory	Concord	CA
Converse Consultants	Reno	NV
Corona del Mar Water Treatment Plant	Goleta	CA
Cranmer Engineering, Inc.	Grass Valley	CA
Crescent City Water Quality Laboratory	Crescent City	CA
Crosby & Overton Analytical Laboratory	Long Beach	CA
CSUMB Los Huertos Laboratories Science & Environmental Policy	Seaside	CA
Culligan Analytical Laboratory	Rosemont	IL
Datalab	San Jose	CA
Davi Laboratories Environmental Associates	Hercules	CA
Del Monte Foods Research Center	Walnut Creek	CA
Dellavalle Laboratory, Inc.	Fresno	CA
Delta Diablo Sanitation District Laboratory	Antioch	CA
Delta Environmental Laboratories, LLC	Benicia	CA
Demenno / Kerdoon	Compton	CA
Denele Analytical, Inc.	Turlock	CA
Desert Water Agency	Palm Springs	CA
Diamond Water Laboratory	Auburn	CA
Dr. Joe Waidhofer Water Treatment Plant Laboratory	Stockton	CA
DS Services of America, Inc.	Los Angeles	CA
DS Services of America, Inc.	Santa Ana	CA
D-TEK Analytical Laboratories, Inc.	Carlsbad	CA
Dublin San Ramon Services District	Pleasanton	CA
Dynegy Moss Landing, LLC - Moss Landing Power Plant	Moss Landing	CA
Dysert Environmental, Inc.	San Mateo	CA
E & J Gallo Winery	Modesto	CA
E & J Gallo Winery (Livingston)	Livingston	CA
E.V.M.W.D. Regional Laboratory	Lake Elsinore	CA
East Bay Municipal Utility District	Oakland	CA
East Bay Municipal Utility District	Walnut Creek	CA
Eastern Municipal Water District	Perris	CA
Eberline Analytical Corporation -- Oak Ridge Laboratory	Oak Ridge	TN
Eberline Analytical Corporation, Richmond Laboratory	Richmond	CA

Eco Services Operations Corp	Martinez	CA
El Dorado Irrigation District	El Dorado Hills	CA
El Portal Laboratory - US NPS	El Portal	CA
El Toro Water District Laboratory	Laguna Woods	CA
Elite Analytical	Livermore	CA
EMAX Laboratories, Inc.	Torrance	CA
EMC Labs, Inc.	Phoenix	AZ
EMLab P&K	South San Francisco	CA
EMSL Analytical Inc.	Houston	TX
EMSL Analytical Inc.	Indianapolis	IN
EMSL Analytical Inc.	Cinnaminson	NJ
EMSL Analytical Inc.	Saint Louis	MO
EMSL Analytical Inc. - San Leandro	San Leandro	CA
EMSL Analytical, Inc	Las Vegas	NV
EMSL Analytical, Inc.	New York	NY
EMSL Analytical, Inc.	San Diego	CA
EMSL Analytical, Inc.	Carle Place	NY
EMSL Analytical, Inc.	Denver	CO
EMSL Analytical, Inc.	Phoenix	AZ
EMSL Analytical, Inc. Seattle	Seattle	WA
Encina Power Station Laboratory	Carlsbad	CA
Encina Wastewater Authority	Carlsbad	CA
Enthalpy Analytical LLC, dba Curtis & Tompkins, Ltd.	Berkeley	CA
Enthalpy Analytical, Inc.	Orange	CA
Envirocheck, Inc.	Orange	CA
Enviro-Chem, Inc.	Pomona	CA
EnviroMatrix Analytical, Inc.	San Diego	CA
ENVIRON	Port Gamble	WA
Environmental Hazards Services, LLC	North Chesterfield	VA
Environmental Micro Analysis, Inc.	Woodland	CA
Environmental Monitoring Div. (EMD) Lab at LA-G Water Reclamation Plant (LA/GWRP)	Los Angeles	CA
Environmental Monitoring Div. (EMD) Lab. at Hyperion Treatment Plant (HTP)	Playa Del Rey	CA
Environmental Monitoring Div. (EMD) Lab. at Terminal Island Water Reclamation Plant (TIWRP)	San Pedro	CA
Environmental Monitoring Division (EMD) at DCTWRP	Van Nuys	CA
Environmental Support Technologies	Irvine	CA
Environmental Support Technologies	Irvine	CA
Environmental Testing Laboratories, Inc.	Romulus	MI
ESC Lab Sciences (Environmental Science Corporation)	Mount Juliet	TN
Eurofin Eaton Analytical, Inc	South Bend	IN
Eurofins Calscience, Inc.	Garden Grove	CA

Eurofins Eaton Analytical, Inc - Folsom, CA	Folsom	CA
Eurofins Eaton Analytical, Inc. - Colton, CA	Colton	CA
Eurofins Eaton Analytical, Inc. - Fresno, CA	Fresno	CA
Eurofins Eaton Analytical, Inc. - Monrovia	Monrovia	CA
Eurofins Frontier Global Sciences	Bothell	WA
Eurofins Lancaster Laboratories Environmental, LLC	Lancaster	PA
Evoqua Water Technologies LLC	Los Angeles	CA
Excelchem Environmental Laboratories, Inc.	Rocklin	CA
Exova, Inc.	Santa Fe Springs	CA
exovaWeston Solutions, Inc.	Carlsbad	CA
Exxon Mobil Oil Corporation Torrance Refinery Water Laboratory	Torrance	CA
Fairfield-Suisun Sewer District Laboratory	Fairfield	CA
Far West Laboratories, Inc.	Riverbank	CA
Fiberquant Analytical Services	Phoenix	AZ
Fillmore Wastewater Recycling Plant Laboratory	Fillmore	CA
Food Microbiological Laboratories, Inc.	Cypress	CA
Forensic Analytical Laboratories, Inc.	Hayward	CA
Fort Bragg Municipal Laboratory	Fort Bragg	CA
Foster Farms	Livingston	CA
Foster Farms Chemistry Laboratory	Delhi	CA
Friedman and Bruya, Inc.	Seattle	WA
Frontier Analytical Laboratory	El Dorado Hills	CA
Fruit Growers Laboratory	Santa Paula	CA
Fruit Growers Laboratory	Chico	CA
Fruit Growers Laboratory - San Luis Obispo	San Luis Obispo	CA
Fruit Growers Laboratory, Inc.	Visalia	CA
Fruit Growers Laboratory, Inc.	Stockton	CA
Garratt-Callahan Laboratory	Burlingame	CA
GEI Consultants, Inc.	Denver	CO
GEL Laboratories, LLC	Charleston	SC
GeoAnalytical Laboratories, Inc.	Turlock	CA
Geo-Monitor, Inc	Hesperia	CA
George Kriskoff Water Treatment Plant - City of Sacramento	West Sacramento	CA
Goleta Sanitary District	Goleta	CA
Granite Canyon -- UC Davis Marine Pollution Studies Laboratory	Monterey	CA
H & P Mobile Geochemistry, Inc.	Carlsbad	CA
H&P Mobile Geochemistry Inc.	Carlsbad	CA
H&P Mobile Geochemistry Inc.	Carlsbad	CA
H&P Mobile Geochemistry, Inc.	Carlsbad	CA
H&P Mobile Geochemistry, Inc.	Carlsbad	CA
H&P Mobile Geochemistry, Inc.	Carlsbad	CA
H&P Mobile Geochemistry, Inc. Lab 6	Carlsbad	CA
H.M. Pitt Labs, Inc.	San Diego	CA

Harbor Generating Station On-Site Laboratory	Wilmington	CA
Haynes Generating Station On-Site Laboratory	Long Beach	CA
Helix Water District	Lakeside	CA
Heritage Ranch C.S.D. Environmental Lab. #1	Paso Robles	CA
Hill Canyon Wastewater Treatment Plant Laboratory	Camarillo	CA
Hillmann Consulting LLC	Union	NJ
Humboldt County Public Health Laboratory	Eureka	CA
IEH Analytical Laboratories	Seattle	WA
IEH-BioVir Laboratories	Benicia	CA
IEH-JL Analytical Services	Modesto	CA
Imperial Valley Environmental Laboratory	Calexico	CA
Inland Empire Utilities Agency Laboratory	Ontario	CA
Inyo County Water Lab	Independence	CA
Irvine Ranch Water District	Irvine	CA
J3 Resources, Inc.	Houston	TX
Jamieson Canyon Water Treatment Plant	Napa	CA
JG Boswell Company Lab	Corcoran	CA
JK BioScience Inc.	Rancho Dominguez	CA
JMR Environmental Services, Inc.	San Diego	CA
John C. Bargar Water Treatment Plant	Ramona	CA
Joint Water Pollution Control Plant Water Quality Laboratory	Carson	CA
Jones Environmental Laboratories, Inc.	Santa Fe Springs	CA
Jones Environmental, Inc.	Santa Fe Springs	CA
K Prime, Inc.	Santa Rosa	CA
Kemper Environmental	Fort Bragg	CA
Kern County Public Health Laboratory	Bakersfield	CA
Kern County Water Agency	Bakersfield	CA
Kern Sanitation Authority	Bakersfield	CA
Kings County Public Health Laboratory	Hanford	CA
LA Testing	Huntington Beach	CA
LA Testing - South Pasadena Laboratory	South Pasadena	CA
Laguna County Sanitation District	Santa Maria	CA
Lake Arrowhead Community Services District	Lake Arrowhead	CA
Lake Bard Water Filtration Plant Laboratory	Thousand Oaks	CA
Lake California WWTP Laboratory	Cottonwood	CA
Lancaster Treatment Plant Laboratory	Lancaster	CA
Las Gallinas Valley Sanitary District	San Rafael	CA
Las Virgenes Municipal Water District Laboratory	Calabasas	CA
Lawrence Livermore National Laboratory, Environmental Safety & Health	Livermore	CA
Lehigh Southwest Cement	Redding	CA
Linda County Water District Wastewater Treatment Plant	Olivehurst	CA
Livermore National Laboratory	Livermore	CA

Lompoc Regional Wastewater Reclamation Laboratory	Lompoc	CA
Long Beach Public Health Laboratory	Long Beach	CA
Long Beach Treatment Plant Laboratory	Long Beach	CA
Long Beach Water Department Water Quality Laboratory	Long Beach	CA
Los Angeles County Public Health Laboratory	South Gate	CA
Los Angeles County Public Health Laboratory	Downey	CA
Los Angeles Dept. of Water & Power, Water Quality Laboratory	Pasadena	CA
Los Coyotes Treatment Plant Laboratory	Cerritos	CA
Madera County Public Health Laboratory	Madera	CA
Malibu Mesa Water Reclamation Plant Laboratory	Malibu	CA
Mammoth Community Water District Laboratory	Mammoth Lakes	CA
Mandalay Generating Station	Oxnard	CA
Marin County Public Health Laboratory	San Rafael	CA
Marin Municipal Water District	Corte Madera	CA
Marina Coast Water District	Marina	CA
Mariposa Public Utility District	Mariposa	CA
Maxxam Analytics	Kennesaw	GA
Maxxam Analytics International Corporation	Mississauga, Ontario	CN
MBC Applied Environmental Sciences	Costa Mesa	CA
McCampbell Analytical, Inc.	Pittsburg	CA
Mel Leong Treatment Plant Laboratory	San Francisco	CA
Merced County Public Health Laboratory	Merced	CA
Metro Biosolids Center Chemistry Laboratory	San Diego	CA
Metropolitan Solutions	National City	CA
Metropolitan Water District of So. CA - F.E. Weymouth Water Treatment Plant Laboratory	La Verne	CA
Metropolitan Water District of So. Ca. - Robert A. Skinner WTP Lab	Winchester	CA
Metropolitan Water District of So. Ca. - Henry J. Mills WTP Lab	Riverside	CA
Metropolitan Water District of So. CA. - Robert B. Diemer WTP Lab.	Yorba Linda	CA
Metropolitan Water District of So. CA.- Joseph Jensen WTP Lab.	Granada Hills	CA
Metropolitan Water District of Southern California - Water Quality Laboratory	La Verne	CA
Michelson Laboratories, Inc.	Commerce	CA
Micro Analytical Laboratories, Inc.	Emeryville	CA
Microbac Laboratories, Inc.	Marietta	OH
Micron Environmental Labs, Inc.	El Monte	CA
MicroTest Laboratories, Inc.	Fair Oaks	CA
Midway Laboratory, Inc	Taft	CA
Mission Springs Water District, Alan L. Horton WWTP Laboratory	Desert Hot Springs	CA
Mobilab Environmental Determinations USA LLC	San Diego	CA
Modesto Regional Water Treatment Plant	Waterford	CA
Montecito Sanitary District Laboratory	Santa Barbara	CA
Monterey Bay Analytical Services, Inc.	Monterey	CA

Monterey County Consolidated Environmental Laboratory	Salinas	CA
Monterey Regional Water Pollution Control Agency	Marina	CA
Moore Twining Associates, Inc.	Fresno	CA
Morro Bay/Cayucos Wastewater Treatment Plant	Morro Bay	CA
Mountain House Community Services District	Mountain House	CA
Mt. View Sanitary District	Martinez	CA
Napa Sanitation District Laboratory	Napa	CA
Napa-Solano-Yolo-Marin County Public Health Laboratory	Fairfield, Ca	CA
National Testing Laboratories, Ltd	Ypsilanti	MI
Nautilus Environmental	San Diego	CA
NAVFAC Southwest San Clemente Island :Laborataory	San Clemente Island	CA
Nestle Waters Quality Assurance Laboratory	Los Angeles	CA
Nevada County Sanitation District #1 Laboratory	Auburn	CA
Nevada Irrigation District Water Laboratory	Auburn	CA
New Cure, Inc.	Monterey Park	CA
Nick C. Degroot Water Quality Laboratory	Oakdale	CA
Nipomo Community Services District	Nipomo	CA
North City Process and Compliance Laboratory	San Diego	CA
North Coast County Water District Laboratory	Pacifica	CA
North Coast Laboratories, Ltd.	Arcata	CA
North Marin Water District	Novato	CA
North of River Sanitary District No. 1	Shafter	CA
North San Mateo County Sanitation District	Daly City	CA
Novato Sanitary District Laboratory	Novato	CA
NRG Pittsburg Generating Station Laboratory	Pittsburg	CA
NSF International	Ann Arbor	MI
NVL Laboratories, Inc.	Seattle	WA
Oilfield Environmental & Compliance Inc.	Santa Maria	CA
Ojai Valley Sanitary District	Ventura	CA
Olivehurst Public Utility District	Olivehurst	CA
Optimal Technology LLC	Thousand Oaks	CA
Orange Coast Analytical, Inc.	Tustin	CA
Orange County Public Health Laboratory	Newport Beach	CA
Orange County Public Health Laboratory	Santa Ana	CA
Orange County Sanitation District	Fountain Valley	CA
Orange County Water District	Fountain Valley	CA
Ormat Nevada, Inc.	Heber	CA
Ormond Beach Generating Station	Oxnard	CA
Oro Loma Sanitary District	San Lorenzo	CA
Otay Water District	Spring Valley	CA
Pace Analytical Services, Inc.	Davis	CA
Pace Analytical Services, LLC	St. Rose	LA
Pace Analytical Services, LLC - Minneapolis, MN	Minneapolis	MN

Pace Analytical Services, LLC-Pittsburg PA	Greensburg	PA
Pace Analytical- Virginia, MN	Virginia	MN
Pacific Agricultural Laboratory, LLC	Portland	OR
Pacific Chemical Labs, Inc	San Diego	CA
Pacific Coast Analytical Services	Sylmar	CA
Pacific EcoRisk	Fairfield	CA
Pacific Gas & Electric Company Diablo Canyon Power Plant	Avila Beach	CA
Pacific Gas & Electric Company San Ramon Laboratories	San Ramon	CA
Pactiv Corporation	Red Bluff	CA
Padre Dam Water Recycling Laboratory	Santee	CA
Palm Springs Wastewater Treatment Plant	Palm Springs	CA
Palmdale Treatment Plant Laboratory	Palmdale	CA
Palmdale Water District	Palmdale	CA
Palo Alto Regional Water Quality Control Laboratory	Palo Alto	CA
Pat-Chem Laboratories	San Fernando	CA
Patriot Environmental Laboratory Services, Inc.	Culver City	CA
Performance Analytical Laboratories, Inc.	Signal Hill	CA
Phillips 66 Company Rodeo Laboratory	Rodeo	CA
Phillips 66 Los Angeles Refinery	Wilmington	CA
Physis Environmental Laboratories, Inc.	Anaheim	CA
Pinole-Hercules Water Pollution Control Plant	Pinole	CA
Pittsburg Municipal Water Treatment Plant Laboratory	Pittsburg	CA
Placer County Public Health Laboratory	Auburn	CA
Pleasanton City Water Laboratory	Pleasanton	CA
Point Dume Club Water Reclamation Plant Laboratory	Malibu	CA
Point Loma Wastewater Chemistry Lab	San Diego	CA
Pomona Treatment Plant Laboratory	Pomona	CA
Port of Los Angeles Testing Laboratory	Wilmington	CA
Positive Lab Service	Los Angeles	CA
Positive Lab Service	Los Angeles	CA
Precision Analytical, Inc.	Bakersfield	CA
Precision Enviro-Tech	Stockton	CA
Precision Petroleum Labs, Inc.	Houston	TX
Primus Group, Inc.	Santa Maria	CA
Professional Service Industries, Inc.	Pittsburgh	PA
ProVera Analytical Laboratories, Inc.	Roseville	CA
Pure Gold Environmental	Redlands	CA
QuanTEM Laboratories, LLC	Oklahoma City	OK
Quartz Valley Indian Reservation Microbiology Laboratory	Fort Jones	CA
Quincy Community Services District	Quincy	CA
R.E. Badger Filtration Plant	Rancho Santa Fe	CA
Ramboll-Environ	Brentwood	TN
Rancho Murieta Community Services District Laboratory	Rancho Murieta	CA

Reference Laboratories	Corona	CA
Reservoirs Environmental, Inc,	Denver	CO
RJ Lee Group, Inc.	Monroeville	PA
Robinson Ranch Water Reclamation Plant	Trabuco Canyon	CA
Rodeo Sanitary District	Rodeo	CA
RTI Laboratories, Inc.	Livonia	MI
Sacramento Regional County Sanitation District Environmental Laboratory	Elk Grove	CA
Safe Food Alliance (a Division of DFA of California)	Fresno	CA
Safety-Kleen of California Environmental Laboratory	Newark	CA
San Diego County Public Health Laboratory	San Diego	CA
San Diego Gas & Electric Environmental Analysis Laboratory	San Diego	CA
San Elijo Joint Powers Authority	Cardiff by the Sea	CA
San Francisco Public Utilities Commission WQD Oceanside Water Treatment Plant Laboratory	San Francisco	CA
San Francisco PUC - Millbrae Laboratory	Millbrae	CA
San Francisco PUC - Moccasin Laboratory	Moccasin	CA
San Joaquin County Public Health Laboratory	Stockton	CA
San Jose / Santa Clara WPCP Laboratory	San Jose	CA
San Jose Creek Water Quality Laboratory	Whittier	CA
San Leandro Water Pollution Control Plant	San Leandro	CA
San Lorenzo Valley Water District	Boulder Creek	CA
San Luis Obispo County Public Health Laboratory	San Luis Obispo	CA
San Luis Obispo County Water Quality Laboratory	San Luis Obispo	CA
San Mateo County Public Health Laboratory	San Mateo	CA
San Onofre Nuclear Generating Station	San Clemente	CA
San Simeon Wastewater Treatment Plant Laboratory	San Simeon	CA
SanAir Technologies Laboratory, Inc.	Powhatan	VA
Sanitary District No. 5 of Marin County	Tiburon	CA
Santa Barbara County Public Health Laboratory	Santa Barbara	CA
Santa Clara County Public Health Lab	San Jose	CA
Santa Clara Valley Water District	San Jose	CA
Santa Clara Valley Water District, Advanced Water Purification Center	San Jose	CA
Santa Cruz County - Health Services Agency, Public Health Laboratory	Santa Cruz	CA
Santa Cruz County Sanitation District Laboratory	Santa Cruz	CA
Santa Margarita Water District Laboratory	San Juan Capistrano	CA
Saugus Treatment Plant Laboratory	Saugus	CA
Sausalito - Marin City Sanitary District	Sausalito	CA
Scattergood Generating Station On-Site Laboratory	Playa Del Rey	CA
Schneider Laboratories Global, Inc.	Richmond	VA
Scientific Analytical Institute, Inc.	Greensboro	NC
Sea Harbor Laboratories	Dallas	TX

Searles Valley Minerals Regulatory Compliance Laboratory	Trona	CA
Seattle Asbestos Test	Lynnwood	WA
Selma-Kingsburg-Fowler County Sanitation District (SFK CSD)	Kingsburg	CA
Sewer Authority Mid-Coastside	Half Moon Bay	CA
Sewerage Agency of Southern Marin	Mill Valley	CA
Sewerage Commission - Oroville Region	Oroville	CA
SFPUC WQD Southeast Wastewater Treatment Plant Laboratory	San Francisco	CA
SFPUC WQD Treasure Island Wastewater Treatment Plant Laboratory	San Francisco	CA
SGS Accutest Inc. - Wheat Ridge	Wheat Ridge	CO
SGS Accutest- Orlando	Orlando	FL
SGS AXYS Analytical Services Ltd.	Sidney, British Columbia	CN
SGS North America Inc.	Wilmington	NC
Shasta County Public Health Laboratory	Redding	CA
Shell Oil Products, U.S. - Martinez Refinery	Martinez	CA
Sierra Analytical Laboratories, Inc.	Laguna Hills	CA
Sierra Dairy Laboratory	Tulare	CA
Silicon Valley Clean Water	Redwood City	CA
Silliker, Inc	Cypress	CA
Silver State Analytical Laboratories, Inc.	Las Vegas	NV
Silver State Analytical Laboratories, Inc. - Reno	Reno	NV
Silver State Analytical Labs - SEM Reno	Reno	NV
Soil Control Laboratory	Watsonville	CA
Sonoma County Public Health Laboratory	Santa Rosa	CA
Sonoma County Water Agency	Guerneville	CA
Sonoma County Water Agency	Sonoma	CA
South Bay Wastewater Chemistry Laboratory	San Diego	CA
South Feather Water & Power Agency	Oroville	CA
South Orange County Wastewater Authority (SOCWA) Regional Laboratory	Laguna Niguel	CA
South San Luis Obispo County Sanitation District	Oceano	CA
South Tahoe Public Utility District	South Lake Tahoe	CA
Southern California Edison	Westminster	CA
Southern California Gas Company	Pico Rivera	CA
Spackman Analytic	Sunnyvale	CA
Sparger Technology, Inc.	Sacramento	CA
SPAWAR Systems Center Pacific Bioassay Laboratory	San Diego	CA
Special Districts Wastewater Treatment Laboratory	Auburn	CA
Spring Street Analytical	Klamath Falls	OR
Stanislaus County Public Health Laboratory	Modesto	CA
Strata -Analysts Group, Inc.	Signal Hill	CA
Summit Environmental Technologies, Inc	Cuyahoga Falls	OH
Sunland Analytical Lab, Inc.	Rancho Cordova	CA

Sunstar Laboratories, Inc.	Lake Forest	CA
Susanville Sanitary District WWTP Lab	Susanville	CA
SVL Analytical, Inc.	Kellogg	ID
Sweetwater Authority	Spring Valley	CA
Tahoe-Truckee Sanitation Agency	Truckee	CA
TEG Northern California	Rancho Cordova	CA
TEG Northern California	Rancho Cordova	CA
Tesoro Golden Eagle Refinery - Bioassay Laboratory	Martinez	CA
Tesoro Los Angeles Refinery Quality Assurance Laboratory	Carson	CA
TestAmerica Sacramento	West Sacramento	CA
TestAmerica St. Louis	Earth City	MO
TestAmerica ASL	Corvallis	OR
TestAmerica Canton	North Canton	OH
TestAmerica Chicago	University Park	IL
TestAmerica Denver	Arvada	CO
Testamerica Environmental Services LLC - San Francisco	Pleasanton	CA
TestAmerica Inc.- Knoxville	Knoxville	TN
TestAmerica Irvine	Irvine	CA
TestAmerica Laboratories, Inc	Nashville	TN
Testamerica Laboratories, Inc.	Nashville	TN
TestAmerica Laboratories, Inc. - Richland	Richland	WA
TestAmerica Laboratories, Inc.- Pittsburgh	Pittsburgh	PA
TestAmerica Pensacola	Pensacola	FL
TestAmerica Phoenix	Phoenix	AZ
TestAmerica Savannah	Savannah	GA
TestAmerica Seattle	Tacoma	WA
The Coca-Cola Company	Anaheim	CA
Three Valleys Municipal Water District	Claremont	CA
TJ/H2B Analytical Services, Inc	Sacramento	CA
Torrent Laboratory, Inc.	Milpitas	CA
Town of Windsor Laboratory	Windsor	CA
Travis Air Force Base Water Laboratory	Travis AFB	CA
TRC Environmental Corporation	Windsor	CT
Triangle Environmental Service Center	Richmond	VA
Truesdail Laboratories, Inc.	Irvine	CA
Tulare County Public Health Laboratory	Tulare	CA
Tulare WPCF Laboratory	Tulare	CA
U.S. Analytical Laboratories	Fullerton	CA
Ukiah Wastewater Treatment Plant	Ukiah	CA
Ultimate Labs Inc	San Diego	CA
UMB Analytical Inc	Hayward	CA
UMB Analytical, Inc	San Diego	CA
Union Sanitary District	Union City	CA

United States Mint San Francisco Laboratory	San Francisco	CA
University of California, Davis, Wastewater Treatment Plant Laboratory	Davis	CA
US Ecology Vernon, Inc,	Vernon	CA
Valencia Treatment Plant Laboratory	Valencia	CA
Valero Benicia Refinery Water/Bioassay Laboratory	Benicia	CA
Vallejo Sanitation & Flood Control District	Vallejo	CA
Valley Center Municipal Water District Laboratory	Escondido	CA
Valley Sanitary District	Indio	CA
Ventura County Public Health Laboratory	Oxnard	CA
Ventura County Waterworks Districts	Moorpark	CA
Veolia - City of Rialto Waste Water Treatment Plant	Bloomington	CA
Veolia Water North America Operating Services	Richmond	CA
Victor Valley Wastewater Reclamation Authority Laboratory	Victorville	CA
Vista Analytical Laboratory	El Dorado Hills	CA
Vista Irrigation District	Vista	CA
Walnut Valley Water District	Walnut	CA
Water Environmental Testing Laboratory	Shingle Springs	CA
Water Resources Laboratory	Santa Barbara	CA
Wawona Water And Wastewater Laboratory (US NPS)	Wawona	CA
Waypoint Analytical, Inc..	Memphis	TN
Weaverville Sanitary District	Weaverville	CA
Weck Laboratories, Inc.	City of Industry	CA
West Basin Water Quality Laboratory	El Segundo	CA
West County Wastewater District	Richmond	CA
Western Analytical Laboratories, Inc.	Chino	CA
Western Environmental Testing Laboratory	Sparks	NV
Whittier Narrows Treatment Plant Laboratory	South El Monte	CA
Yuba City Water/Wastewater Laboratory	Yuba City	CA
Zalco Laboratories, Inc.	Bakersfield	CA
Zone 7 Water Quality Laboratory	Livermore	CA

Appendix B

Comments from the Laboratory Respondents (question 21) to the SWRCB:

Additional cost with little improvement to data quality. TNI allows reporting of poor data as long as the recipeint of the data is informed. ELAP inspector training is critical. The downfall of the last group was that there were significant differences between inspectors in terms of what they know about methods, which resulted in variability between audits for the same method.
I do not believe ELAP needs to draft new regulations.
With the new regulations, who bears the responsibility if an ELAP auditor is unable to perform a laboratory inspection in time for application renewal given sufficient notice from the laboratory? What would be the consequences of this? Would the laboratory then be required to hire a third party assessor?
Better clarification as to what changes / modifications will need to be made in the lab.
If ELAP is going through with it, I'd like them to tell us how it can be implemented (structure of the lab) and to provide templates of the required documentation, like the SOPs and Water Quality System.
Third party professional auditing firms would be most welcome for CA ELAP accreditation purposes.
Incorporating proprietary TNI standards into the new regulations that are not freely available to the public lacks transparency. Furthermore, it is unclear how the new regulations will result in better data that will enhance environmental and public health.
Adopting TNI is really overkill for small to medium sized labs that perform only routine types of water tests
I have read the draft ELAP regulations but I have not read any of the TNI documents
For small labs with low test volumes and low revenue generation, the new removal of exemption from fees for Public Health Labs places in jeopardy the continuation of testing/certification.
Adopting TNI , will be unnecessary burden on small labs with limited employees to comply with paper work requirements without the benefit of being nationally recognized lab. Why not have a CA-specific regulation that benefits laboratory community and the public health. This draft regulation will forces small labs like us to go out of business!
None at this time, I need more time to evaluate the TNI standards that will be required. Although I will say that the added fees to make minor changes to certifications (e.g., change of name, location, etc) seem excessive, considering these are in addition to the increased fees of testing and doesn't require the addition of new standards, an additional site review, etc., maybe just paperwork.
I would like ELAP to take a step approach to make it feasible for all labs to maintain certification in the state CA
We're very concerned that the fees will continue to increase because ELAP has not maintained current operations. There will be increased fees for outside assessors. Fee increases will be passed on to private drinking water system owners who be most impacted. Public Health Labs, which are not for profit labs already pay for CLIA or CAP accreditation. We don't believe we are getting similar services from ELAP based on the fees we are being charged.
CA ELAP needs to understand the concept of "flexible scope", as applied by A2LA. There are analytes in the FOT list for which no proficiency testing schemes exist. This held up the processing of our renewal by about six months. We are looking forward to expanding our scope of accreditation with A2LA to include TNI and we believe that recognition of third party accreditation is an essential path for CA ELAP.

Implantation of TNI will drive small labs like mine out of business. Proposed rules are waste of time and money without real improvement.
Why is all the new documentation necessary? Isn't our goal to provide imformation to protect public health?
How will ELAP effectively communicate with labs in regards to the availability of new methods, PT requirements (i.e. analyte lists for organics/new PTs), changes to accreditation requirements? What is the appeals process for ELAP's accreditation decisions? Who will audit ELAP to ensure compliance with their management system (ISO 17011)?
Is the TNI 2016 standard going to be included in the federal register to become law? If not, how can we be obliged to follow it, if it is not law.
If a majority of ELAP certified Labs are exemplary at meeting ELAP standard and only a few are not meeting ELAP standard, why not concentrate limited resources to address the crest-fall labs instead of expanding current ELAP administration operations at massive cost to ELAP certificate holders? Smell like a self serving money grab. Also, why is it that because ELAP cannot run their own business model successfully, that I have to pay increased fees etc with no added value to data quality.
I think that while well intentioned, the shift to TNI is overly cumbersome for small labs.
With our current staffing size and small budget, we simply would not be able to keep up with the extensive requirements for the TNI standard. Small agencies like ourselves would be hurt the most by these new standards because we simply will not have the manpower and staffing to follow the guidelines.
Nothing they haven't heard, but continue to ignore. Only in CA would a an organization be behind and the solution is to develop a more comprehensive plan....
More of an explanation of what it is that they want.
ELAP does not seem to listen to or incorporate input from ELTAC. The proposed TNI standard is too burdensome for a laboratory of my size to implement.
Although I don't disagree with the adoption of the TNI standards, the laboratory community (who are ELAP's primary customers) was largely left our of the decision making process. This has only increased the level of mistrust and accromony between ELAP and the laboratories they accredit.
The TNI 2016 standard has a lot of information for a one person laboratory, it has been a struggle and difficult journey thus far to keep up. We wish that ELAP can give laboratories more time to review the TNI standard and slowly implement some changes as the years go on. 3 years is not enough for labs to review, implement a standard that has not ever been introduce to California labs.
I would like ELAP to here voices of the small lab community. I agree that every lab should be certified but for small labs to have to tackle the same burden that large 50 person labs have to, you might as well throw in the towel cause it is not going to happen. This is what frustrates me the most. I really dont feel like going to work everyday to knowing that i might drop of a heart attack having to comply not only with a standard that is impossible to implement but having to do my daily analysis also. My job requirements already have me doing work 8 hrs a day. To require anymore stuff is just going to put us over the edge. Most places are not going to hire extra people to do a one person job. The only other option is to decertify and run process control work.
Will the new fees be based on FOTs or Methodology?
I think there is a need for ELAP to hire more staff to answer issues and questions in a timely manner.
Why are you expecting the labs to comply with TNI but not accrediting TNI?
I will drop my certification rather than adopt TNI.
Address how out of state labs will be handled

I see no reason that non-Nelac certified laboratories should be subject to policies and procedures developed for that entity. If ELAP insists upon compliance with those standards, then perhaps they should step aside and simply require NELAC certification of all California laboratories and in so doing, forego the collection of the adopted fees.
ELAP is increasing the certification cost significantly without any evidence that it would improve the quality of data or the labs'performance.
ELAP needed to concentrate fixing the PROCESS first. This means getting audits and certification paperwork right first. This is what was lacking with ELAP. Once this was straightened out, they could concentrate on how/what was needed to improve the labs. I do not need an SOP on how to write an SOP!!! Maybe the current regulations are more than adequate, but they would not know because their system to check this out was broke. The small lab is done in this sytem with the new regulations.
1. It is my opinion it would benefit every laboratory if ELAP would work in conjunction with the approved PT vendors to include a column in the FOT selection as to what PT's are appropriate for those methods/analyte(s). How would laboratories know if new PTs are available and if listed on the FOT selection to ensure completion of on-time PTs? 2. Will NELAP accredited labs have to have certifications line up with the CA ELAP proposed due date of the Sept 1st (section64802.05 C6(f)) as our NELAP cert expires in January? As we are NELAP accredited it's required to do 2 sets of PTs annually per matrix, so this wouldn't be feasible or possible with the way the PT vendor programs are set up; nor would it allow proper root cause analysis on failures or make ups before submitting data for renewal applications. 3. Section 64802.10 Quality Systems, d2. If my lab is already accredited by another AB as NELAP per TNI requirements why would it be necessary to submit quarterly reports to the state board? What information is going to be required in the report? Who would review this to ensure it has quality information? What is expected from the information and will someone be making an assessment regarding our certification from a quarterly report? 4. Section 64812.00, Lab Personnel. Changing of titles, creates an inconsistency with NELAP accredited bodies as my quality manual and objectives in the laboratory are more strict than the proposed; therefore our laboratory will either exceed CA ELAP requirements with TNI because we utilize the full TNI. How will CA ELAP assessors be able to make proper assessments if not using the full TNI quality requirements? 5. Is the on-site assessment process moving from a 2 to a 3 year cycle? When and how will this be implemented? How would it be determined what labs to start with as all labs are on different renewal cycles?
I don't see how the TNI standard will help data quality.
Our biggest issue is inconsistency among state regulations. Sometimes there are conflicting regulations because states are using different versions of TNI standard or simply EPA or SDWA regs.
I feel that requiring laboratories to pay to view the new standard is unacceptable.
Please provide ample support to help labs improve their quality system with suggestions, workshops, and guidance during audits. Don't shortchange the effort to help labs transition to a better qms.
CVCWA and COL are addressing my concerns
Need more TNI training classes to implement TNI in ELAP Quality Systems
Applying TNI standard force the lab to hire a new person to handle all the documentations also the standard should be free of charge.
No more fee increase. The ELAP cost is a huge burden to the lab community.
Even if given a voice, as a VSBE, we rarely have time to speak. Question 15 required an answer, but I really do not know what it entails yet.
ELAP should slow the process down and assess the capabilities of their current staff to understand and enforce existing regulations prior to establishing new regulations that will increase the workload on both laboratories and ELAP staff.

Additional (more than 1 per year) PT samples is an unnecessary cost (time and material) as compared to the benefit you get from just done annually. AnalyticalTesting prices are competitive enoughthat these unwarranted cost can mean the shutdown of lab and livelihood of the employees. Unemployment increases.
None that haven't already been raised by ELTAC, CWEA, and others.
I don't think that ELAP has fully evaluated how the proposed regulations will affect very small laboratories. In particular, the time frames that are set for responding to ELAP notice of incomplete applications and the number of days managment can be on leave. Our organization will either have to amend job descriptions to have more than one position qualified to be laboratory director and/or hire additional employees. Our organization is looking at options for contractiong all complaince laboratory work due to the significance of the required changes.
The regional workshops were informative about the new ELAP rules. Please continue to have these kind of communication.
For POTW / Municipal laboratories, like ours, ELAP needs develop language that addresses and removes the need for a Laboratory Supervisor / Director to have a Bachelors degree. Employee development, succession planning and career growth are critical financial investments to the successful operation of a municipal laboratory. Staff development, years of experience and certification via the CWEA should be used for meeting this requirement.
all comments have been submitted
The scalability of the TNI standards for small municipal labs has yet to be determined. I am very concerned that, with the limited staffing and resources I have, the numerous documentation requirements contained in the TNI standards will acutally pull laboratory staff from their core responsibilities of sampling and analysis and may not improve data quality. Also, implementing the TNI standards may require hiring additional laboratory staff, which may be difficult to do (from a budgetary standpoint) with the loss in revenue that the Sweetwater Authority has experienced due to the severe drought in California over the past five years.
How are small labs going to handle the extra workload/cost to achieve TNI compliance?
Comments we would like ELAP to address regarding the Preliminary Draft Regulations will be submitted via the requested methods listed on ELAP's website.
During the review of the draft regulations, I was not available to review the TNI 2016 Standards, because I do not own a copy of TNI 2016 Standards.
Calistoga is seriously considering dropping certification if the TNI Standard is adopted.
Certification turn around after on-site inspections
New tests/analytes need to be added to FOTs to match EPA promulgated methods, for example fecal coliforms by colilert-18/quantitray.
inclusion of TNI standards is a positive development from our laboratory perspective
Concerning that ELAP has increased fees to increase their staff, yet they are still short handed and wonder if extra staff was even added. Then by adding more regulations with TNI Standards, it seems like that's going to create even more work flow and they can't even handle the current work flow.
Please consider ELTAC and CVCWA comments. Please consider one person lab issues.
have a two tiered system, big labs who can manage the workload can go to TNI, but a small 2 person lab such as mine can not handle the work load and the extra load will only make our time analyzing samples less and less. This will hurt the quality of the data.
The proposed changes will put a larger burden on small labs like ours to implement what seem like superfluous procedures in the name of producing data of the same quality as is currently produced.

ELAP needs to reduce costs like the certified labs do instead of creating more work and spending more money.
ELAP should consider adding the FOT for PCB congeners by EPA Method 1668C since these compounds are being sampled and tested within the State of California.
we are a 2 person lab. Lab supervisor and lab analyst. The lab supervisor would be the technical manager, quality manager and the analyst. Would that be possible with the TNI system? or would we have to hire another analyst and seperate the lab supervisor from the analyst jobs?
There have been multiple occasions where our emails to the ELAP contact address have not been returned.
Like Christine Sotelo said on a recent webcast, "we are not automatons".
For reciprocity, will ELAP accept onsite assessments to the 2009 TNI Standard? It appears CA will be the first state to adopt the 2016 Standard. Please be aware of third party assessor special interests shaping state regulations.
My laboratory has not been audited by ELAP in 3 years. What is our ELAP accreditation fee going towards if my lab is not being audited?
ELAP has marching orders from the State Board and its States Holders who use the data. The labs were an after thought.
On-site Assessment by 3rd parties, Seperate fees for on-site assessments by the State Board, Policy regarding procurement of laboratory supplies.
I think there are some good things with TNI but I dont think it necessarily will change any of the data for the enduser. A lot of the new changes are documentation that will take a lot of time to implement and maintain. As an 8 person lab we are already busy with the LIMS , instrumentation, safety, recycled water, drinking water, wastewater and all the FOTs we are certified for. Some lab managers I speak with are overwhelmed already and this is without TNI on their plate. We do not have extra positions to cover this extra documentation.
I do not see how the TNI standards improve our data quality!!!!!
We need simple solutions and not more complexity. I did not have any issues with past ELAP certification. It seems that ELAP wants to be enforcement enity that either decertifies a lab or fines them heavily.
the new regulations with the TNI program is complete overkill
Seperation of large public comercial labs vs Small public utility labs Please acknowledge the differences!!!! Response time from ELAP is poor. Called in with question - leave a message - no one calls back (currently waiting for an answer and it has been 3+ weeks so far, yes, followup email was sent)
It takes them way to long to certify new FOTs. With the new technology, web cams live streaming etc. certfication can be done remotely in many cases.
I would like them to demonstrate legal precedent for what they trying to force on ELAP labs with the inclusion of TNI. The current language shows an extreme disconnect with the laboratory community and an ulterior motive for such draft legislation.
The water board is currently closing the contaminated sites with medium level of contaminants such as benzene, toluene.In such situation why are you going to implement more sever regulations?and force the labs to close.
I appreciate the work that has gone into improving ELAP because it was definitely in need of help with consistancy and structure. However, I believe going to almost full TNI swung the pendulum a little far and I do not think this will improve data quality.

ELAP needs to address the time schedules for PT studies, esp. the 7-day after a PT failure. Our division composed of the water lab, wastewater lab, and microbiology lab has sent a list of comments, questions, and concerns prior to the deadline.
Ms. Sotelo was very generous with her time when I complained recently about ELAP not issuing new certificates when previous certificates expired. She called, I talked, and she listened. Its been an ongoing problem for several years. The point I was trying to make is that I don't have time to chase down new certs. If I submit my application and fees more than three months before my current cert expires, why can't I expect to have the new cert delivered on time and without my intervention? I understand that ELAP is going through significant changes. I'm hoping that this aspect of the accreditation process improves.
Massively more complex does not result in higher quality data, and may reduce data quality.
I support ELAP plans to improve the lab accrediation I know it will affect labs that are small in staff to do extra to maintain the requirements maybe to see that it is other ways to keep the small staff work manageable.
ELAP was the problem not the labs and ELAP has not been fixed.
individualized help in learning how this lab can comply with TNI
Issues with maintaining TNI standards in small laboratories

CLOSE – REVIEW ACTION ITEMS

Stephen Clark, Chairperson

Upcoming ELTAC Activities

- Your comments on the second preliminary draft regulations due to ELAP by July 25th
- ELAP Update to the Board at October 2nd Board Meeting
  - Includes ELTAC Chairperson Annual Update
- Next ELTAC meeting in October or November
  - ELAP will send Doodle Poll following meeting
  - Will include your annual oral report on constituent communications

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